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Attorneys for Plaintiff Ruben Alvarado and Proposed Plaintiff Whitey Davis

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

RUBEN ALVARADO, individually, and
on behalf of other members of the
general public similarly situated;
WHITEY DAVIS, individually, and on
behalf of other members of the general
public similarly situated and on behalf of
other aggrieved employees pursuant to
the California Private Attorneys General
Act;

Plaintiffs,

vs.

CITADEL SERVICING
CORPORATION, a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 30-2019-01057617-CU-OE-CXC

Honorable Kirk H. Nakamura
Department CX103

CLASS ACTION

**DECLARATION OF RUBEN ALVARADO IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Motion for Preliminary Approval of Class Action
Settlement; Declarations of Class Counsel (Edwin
Aiwasian and Heather Davis); Declaration of
Proposed Class Representative (Whitey Davis);
and [Proposed] Order Granting Preliminary
Approval filed concurrently herewith.]

Reservation No.: 73471719
Date: April 1, 2021
Time: 2:00 p.m.
Department: CX103

Complaint Filed: March 18, 2019
FAC Filed: March 2, 2021
Jury Trial: None Set

DECLARATION OF RUBEN ALVARADO

I, **Ruben Alvarado**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am a named plaintiff in the above-captioned case, and I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendant Citadel Servicing Corporation ("Citadel") from approximately November 9, 2015 to February 1, 2016 and approximately August 2, 2016 to August 15, 2016 in a non-exempt, hourly-paid position and from approximately February 1, 2016 to August 2, 2016 in a salaried position. I decided to seek legal advice about my work experiences at Citadel and about filing a lawsuit to seek to redress my grievances. I contacted Lawyers for Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Citadel was held accountable for misclassifying some employees as exempt and not properly compensating all employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated class action lawsuits on my own and did some research into the leading employment law firms in California for approximately 10 hours. Thereafter, I consulted with the attorneys at Lawyers for Justice, PC for almost 8 hours discussing my situation, representative and class action lawsuits, and what it meant to bring a class action as a named plaintiff.

3. Since becoming involved in this matter, I have spent over 16 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which has included providing documents concerning my employment with Citadel, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of non-exempt and salaried employees, and helping develop a strategy as to what documents and information to obtain from Citadel. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

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4. Throughout my involvement in this case, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information as I could. I spent at least 11 hours speaking with my attorneys about the case, sending them documents, identifying potential witnesses, and also describing policies, practices, and procedures of Citadel.

5. I spent about 4 hours reviewing the settlement agreement and about 3 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to seek relief for the class members. I think my efforts helped to get the result obtained in this case.

7. I respectfully request that the Court approve and award me a service award in the amount of \$10,000.00 for my efforts and active participation in the case and broader release of claims. Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

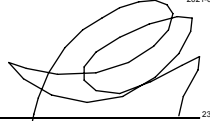
8. I am not related to anyone associated with Lawyers *for* Justice, PC or Protection Law Group LLP.

9. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is a service award, if approved by the Court, as well as my share of the settlement as a class member.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 19, 2021, at Santa Ana, California.

Electronically Signed
2021-02-19 19:28:57 UTC - 174.248.215.204
AssureSign® 23e0ccf5-2de2-4f3b-8df1-ae03013e860c



Ruben Alvarado