

David P. Myers (SBN 206137)
dmyers@myerslawgroup.com
Robert M. Kitson (SBN 214091)
rkitson@myerslawgroup.com
Jason Hatcher (SBN 285481)
jhatcher@myerslawgroup.com
THE MYERS LAW GROUP, A.P.C.
9327 Fairway View Place, Suite 100
Rancho Cucamonga, CA 91730
Telephone: (909) 919-2027
Facsimile: (888) 375-2102

Attorneys for Plaintiff CHARLES RODRIGUEZ on behalf of himself
and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

CHARLES RODRIGUEZ, an individual, on
behalf of himself and all others similarly
situated

Plaintiff,

vs.

US BANK NATIONAL ASSOCIATION, dba
US BANK; and DOES 1 through 100,
inclusive

Defendants.

Case No. BC617356

CLASS ACTION

Assigned to: *Hon. Amy D. Hogue; Dept. 7*

**DECLARATION OF ATEFEH YOUSEFI
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: March 9, 2022

Time: 11:00 a.m.

Courtroom: 7

Action Filed: *April 15, 2016*

Related Case: 19STCV17516

1 Larry W. Lee (State Bar No. 228175)
2 Kristen M. Agnew (State Bar No. 247656)
3 Nicholas Rosenthal (State Bar No. 268297)
4 **DIVERSITY LAW GROUP, P.C.**
5 515 S. Figueroa Street, Suite 1250
6 Los Angeles, CA 90071
7 (213) 488-6555
8 (213) 488-6554 facsimile

9 William L. Marder (State Bar No. 170131)
10 **Polaris Law Group LLP**
11 501 San Benito Street, Suite 200
12 Hollister, CA 95023
13 Tel: (831) 531-4214
14 Fax: (831) 634-0333

15 Attorneys for Plaintiff Ali Malik, Atefeh Yousefi,
16 and all others similarly situated.
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DECLARATION OF ATEFEH YOUSEFI

I, Atefeh Yousefi, declare as follows:

1. I am an individual over the age of 18 and am a resident of California. I am the named Plaintiff in this matter. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I was employed by US Bank National Association ("Defendant" or "US Bank") as a personal banker from approximately September 2000, until on or about July 2019. Throughout my employment with US Bank, I was a non-exempt employee.

3. During my employment with US Bank, I worked at the Rancho Santa Fe location.

4. During my employment, whenever I received various bonuses, including but not limited to "AwardPrize," "BestInUs," "InvestInsur," "BuLineCls," the bonuses were not factored into the regular rate of pay for overtime purposes. Rather, I received overtime that was solely 1.5 times our base rate of pay.

5. Further, the overtime rates of pay, as well as the gross and net wages earned as reflected on my itemized wage statements, were inaccurately identified. Specifically, because of the miscalculation and under payment of overtime pay, the wrong overtime rate of pay was listed, and the gross and net wages earned identified on the wage statements did not accurately reflect the correct amount of wages that should have been paid had the overtime rate been accurately calculated.

6. Additionally, whenever sick pay was paid, I was paid at my base rate of pay rather than the regular rate of pay. Specifically, whenever I earned non-discretionary incentive wages and bonuses, it was not calculated into the regular rate of pay.

7. I understand that this action was brought on behalf of other similarly situated employees who worked for Defendant within the State of California, and thus I am acting as a representative for the Class. As class representative, I understand that it is my responsibility to act in the Class's best interest. I am not aware of any conflicts that exist between my interest and the interests of the Class that would impair or affect my ability to serve as representative for the Class. I understand my duties and responsibilities to the proposed class and will carry out those duties as

1 necessary.

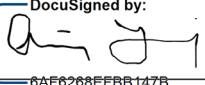
2 8. I have and continue to be willing to assist in the investigation of this matter as well
3 as make myself available for trial or any further proceeding in this matter as required to represent
4 the interests of the Class. I have met with my attorneys and discussed the case, as well as provided
5 information and documents for this case. I have spent a considerable amount of time meeting and
6 corresponding with Class Counsel and providing documentation to Class Counsel.

7 9. I also understand that as part of this settlement, I am providing a general release of
8 claims and a waiver of the protections of Civil Code § 1542.

9 10. I have discussed the terms of the settlement with my attorneys, and based on the
10 information provided, I believe the settlement to be fair, adequate, and reasonable for myself and
11 for the entire Class.

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

14 Executed on this 11/5/21 day of November 2021, at San Diego, California.

15 DocuSigned by:
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18 SAF6268EFBB147B...
19 Atefeh Yousefi
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PROOF OF SERVICE

I am employed in the office of a member of the bar of this Court at whose direction this service was made. I am over the age of 18 and not a party to the within action; my business address is 9327 Fairway View Place, Ste. 100, Rancho Cucamonga, California 91730.

On November 29, 2021, I served the foregoing document described as **DECLARATION OF ATEFEH YOUSEFI IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** on the interested parties in this action as follows:

Joan B. Tucker Fife
jfife@winston.com
WINSTON & STRAWN LLP
101 California Street, 35th Floor
San Francisco, CA 94111
Attorneys for Defendant US Bank National Association
SERVICE BY CASEANYWHERE

Tristan R. Kirk
tkirk@winston.com
Emile C. Woodhead
ewoodhead@winston.com
WINSTON & STRAWN LLP
333 South Grand Avenue, Suite 3800
Los Angeles, CA 90071
Attorneys for Defendant US Bank National Association
SERVICE BY CASEANYWHERE

Larry W. Lee
lwlee@diversitylaw.com
Kristen M. Agnew
kagnew@diversitylaw.com
Nicholas Rosenthal
nrosenthal@diversitylaw.com
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
Attorneys for Plaintiff Ali Malik and Atefeh Yousefi
SERVICE BY EMAIL

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PROOF OF SERVICE

1 I am “readily familiar” with the firm’s practice of services of process. Under that
2 practice, this document would be deposited:

3 **(VIA E-SERVICE)** I caused the document(s) to be served by CASEANYWHERE
4 by transmitting a true and correct copy to CASEANYWHERE to serve the parties listed
5 above; and

6 **(BY EMAIL)** I caused the document(s) to be sent to the person(s) at the electronic
7 address(es) listed above.

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

10 Executed on November 29, 2021 at Rancho Cucamonga, California.

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12 _____
13 Yvonne Medina
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