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Attorneys for Plaintiffs and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

CINTHIA MENDOZA and DELISHIA
HYDE, as individuals and on behalf of all
others similarly situated,

Plaintiffs,

vs.

PRIME NOW LLC, a Delaware limited
liability company; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: RG20068286

(Assigned to the Hon. Evelio Grillo, Dept. 21)

**DECLARATION OF SHALOM
“CHRISTINE” CHOO IN SUPPORT OF
PLAINTIFFS’ MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT**

Date: December 20, 2022
Time: 10:00 A.M.
Dept.: 21

Reservation No.: 429567802028

Complaint Filed: July 21, 2020
FAC Filed: April 5, 2022
SAC Filed: November 4, 2022
Trial Date: None Set

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I, Shalom “Christine” Choo, declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am a member of the law firm Diversity Law Group, counsel of record for Plaintiffs Delishia Hyde, Clara Trotter, Eugenia Dubose, and Araya Turner (collectively, “Plaintiffs”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I am one of the attorneys on this matter. My qualifications are as follows: Prior to attending law school, I had approximately 5 years of experience as a Litigation Paralegal. During law school, I was a Legal Intern for the U.S. Department of Veterans Affairs, a Judicial Intern for the Honorable James A. Bonifant of the Circuit Court for Montgomery County, and a Summer Associate for the Law Firm of Paley Rothman. I was also a Law Clerk for the Law Offices of Choi and Associates until I began my employment at Diversity Law Group, P.C. I received my JD from University of Baltimore in 2021. Upon graduation from law school, I was admitted to the California Bar in 2021.

3. I am currently an associate at the law firm Diversity Law Group, P.C., an employment law firm that has handled numerous wage and hour class and individual actions, on both plaintiff and defense sides. The firm currently has cases in Alameda Superior Court, San Diego Superior Court, Santa Clara Superior Court, Sacramento Superior Court, Alameda Superior Court, Monterey Superior Court, San Francisco Superior Court, San Joaquin Superior Court, Kern County Superior Court, San Bernardino Superior Court, and the United States District Courts for the Central, Northern, and Eastern Districts of California.

4. I am currently handling numerous wage and hour class action and PAGA lawsuits, including *Marin v. Sea World LLC* (Case Number 37-2021-00047859-CU-OE-CTL, Case Number Case Number 37-2022-00001083-CU-OE-CTL); *Marin v. HB Leisure, Inc.* (Lead Case Number 37-2021-00048225-CU-OE-CTL); *McFarland v. Helix Electric, Inc.* (Case Number 21CV391268, Case Number 22CV394399); *Ford v. The Silver F, Inc.* (Case Number 34-202100313161, Case Number 34-2022-00315620); *Cook-Farrar v. The RealReal, Inc.* (Case

1 Number CGC-22-597986, Case Number CGC-22-599036); *Brown v. HP Hood LLC* (Case
2 Number 34-2022-00315068, Case Number 34-2022-00318020); *Levingston v. Commerce*
3 *Distribution Company LLC* (Case Number 22STCV05730); *Deaver v. Blue Diamond Growers*
4 (Case Number 34-2022-00316490, Case Number 34-2022-00319378); *Lang v. PNS Stores, Inc.*
5 (Case Number 34-2022-00318520); *White v. Cortech West Staffing, LLC* (Case Number STK-
6 CV-UOE-2022-0009807); *Chanley v. Growers Transplanting, Inc.* (Case Number 22CV002837);
7 *Bolding v. Cardinal Financial Company* (Case Number CIVSB2206543); *Parra-Marquez v. PRC*
8 *DeSoto International, Inc.* (Case Number BCV-22-100704); *Khoshchin v. Atria Management*
9 *Company, LLC* (Case Number 2:22-cv-00916-TLN-KJN, Case Number 34-2022-00322277-CU-
10 OE-GDS); *Galvez v. Joseph J. Albanese, Inc.* (Case Number 22CV397197); *Marsh v. Burberry*
11 (Case Number 22CV016122); *Conner v. Red Wing Brands of America* (Case Number 22-CIV-
12 03830) . I have also assisted the firm in numerous wage and hour class action mediations. Most
13 recently, I assisted the firm in successfully obtaining class certification by the United States
14 District Court, Central District of California in the case of *Sims v. QG Printing II, LLC* (Case
15 Number ED CV 20-1632-DMG (KKx)) and by the Santa Clara Superior Court in the case of
16 *Flores v. San Jose, LLC* (Case Number 20CV371772).

17 5. Based on my own independent investigation and evaluation, I am of the opinion
18 that the settlement for the consideration and on the terms set forth in the Class Action Settlement
19 Agreement and Release (“Settlement Agreement”) is fair, reasonable, and adequate and that the
20 settlement is in the best interests of the Settlement Class, in light of all known circumstances and
21 the expenses and risks inherent in litigation. I also believe in the fairness of the settlement based
22 on factoring in the uncertainty and risks to Plaintiffs involved in not prevailing on their class
23 claims at trial and the possibility of appeals.

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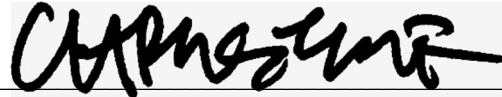
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1 6. I have no conflicts with the Settlement Class and will adequately represent the
2 Settlement Class.

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

5 Executed on this 28th day of November 2022, at Los Angeles, California.

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7 Shalom "Christine" Choo
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