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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

ADRIAN VIDES, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

CELOSEAL ROOFING, INC., a California
Corporation; and DOES 1 through 100,

Defendants.

CASE NO. 30-2020-01162478-CU-OE-CXC

*[Case assigned for all purposes to the Hon.
Randall J. Sherman]*

**DECLARATION OF ALMA V.
MONTENEGRO IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: October 15, 2021
Time: 10:00 a.m.
Dept.: CX105
Reservation: 73603939

Action Filed: September 28, 2020
Trial Date: None Set

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I, Alma V. Montenegro, declare as follows:

1. I am an associate with Haines Law Group, APC, and counsel for the named Plaintiff Adrian Vides (“Plaintiff”) in the above-captioned matter. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I am a 2018 graduate of the University of San Diego School of Law, where I was awarded the Faculty Honor Scholarship. During law school I interned for the Southern District of California's United States Attorney's Office and for the San Diego District Attorney's Office in the Appellate & Training division, among others. After graduating from law school, I worked as a Post-Bar Law Clerk at Lang, Richert and Patch ("LRP"), a full-service law firm in Fresno, California. I was admitted to the California State Bar in December 2018. Since that time, I have practiced in the area of employment litigation. Specifically, from September 2018 to August 2020, I worked as an associate at LRP where the vast majority of my work focused on defense and plaintiff-side employment cases in discrimination, harassment, and wage and hour laws. Although non-exhaustive, the type of work I performed included: conducting client intakes; performing pre-filing research and analysis; drafting complaints and letters to administrative agencies; attending court hearings; corresponding with opposing counsel; drafting and responding to written discovery; analyzing payroll and timekeeping records; drafting complaints and mediation briefs; attending mediations; interviewing witnesses; drafting and responding to demand letters; research and writing memoranda; engaging in settlement negotiations; and drafting dispositive motions. Additionally, since September 2018, I have been a monthly volunteer for Legal Aid at Work's Workers' Rights Clinic.

3. Since September 2020, I have worked as an associate at my current firm, Haines Law Group, APC. I am currently involved with approximately fifty (50) active wage and hour class actions, including a number of “hybrid” actions asserting nationwide wage and hour claims

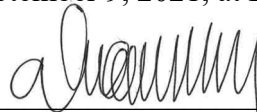
1 under the Fair Labor Standards Act, as well as California-specific claims under Rule 23 of the
2 Federal Rules of Civil Procedure.

3 4. In addition to the above cases, I also play a significant role in many of my firm's
4 current wage and hour class actions. The scope of my involvement includes but is not limited to:
5 corresponding with opposing counsel; attending court hearings; drafting and responding to
6 written discovery; preparing for and defending depositions; drafting long-form settlement
7 agreements; attending mediations; and drafting motions for preliminary and final approval.

8 5. As counsel for Plaintiff, I have been closely involved in all aspects of this litigation
9 since September 2020. The details of the work completed by Class Counsel in this case are set
10 forth in the declaration of Fletcher W. Schmidt, filed concurrently herewith.

11 6. I confirm that I do not have any interest or involvement in the governance or work
12 of the proposed cy pres recipient, Legal Aid SoCal. Likewise, I am not affiliated with the proposed
13 settlement administrator, Phoenix Settlement Administrators.

14 I declare under penalty of perjury under the laws of California and the United States that
15 the foregoing is true and correct. Executed on September 9, 2021, at El Segundo, California.

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17 Alma V. Montenegro
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