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**SUPERIOR COURT OF STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE –CIVIL COMPLEX CENTER**

KATHERYN ENRIQUEZ, as individuals and
on behalf of other similarly situated employees,

Plaintiff,
vs.

VINTAGE REAL ESTATE GROUP, INC., a
California corporation, and DOES 1-50,
inclusive,

Defendants

CASE NO: 30-2020-01157744-CU-OE-CXC

Assigned for all purposes to:
Judge Peter Wilson
Dept. CX102

**DECLARATION OF KATHERYN
ENRIQUEZ IN SUPPORT OF MOTION
FOR ORDER APPROVING
SETTLEMENT UNDER CALIFORNIA
LABOR CODE SECTION 2699 ET SEQ**

Case filed: August 28, 2020
Trial date: TBD

**DECLARATION OF KATHERYN ENRIQUEZ IN SUPPORT OF MOTION FOR
ORDER APPROVING SETTLEMENT UNDER CALIFORNIA LABOR CODE
SECTION 2699 ET SEQ**

1 I, Katheryn Enriquez, declare as follows:

2 1. I currently reside in California. I am over the age of eighteen and have personal
3 knowledge of everything stated below and could competently testify to these facts if sworn.

4 2. I submit this Declaration in support of the motion for approval of Private Attorney
5 General Act claims and enhancement fee.

6 3. I worked for Vintage Real Estate Group, Inc., ("Defendant"). I worked for Vintage Real
7 Estate Group, Inc as an hourly worker. While working for VREG I worked very hard and felt
8 that I was not being treated like a valued worker. After my employment ended with VREG, I
9 determined that I would attempt to effectuate a change in VREG's practices and policies through
10 a representative action under the Private Attorney General Act. After consulting with a law firm,
11 I decided to file a representative action claim against VREG. Despite the risks, I still decided to
12 take the risk of filing this representative action and risk losing this case that could have exposed
13 myself and my family to certain attorneys' fees and costs incurred by VREG. However, my
14 passion to vindicate the rights of my coworkers outweighed the risk exposure to myself and my
15 family as I believed that my co-workers deserved to be treated fairly in the eyes of the law.

16 4. Throughout this case, I was required to appear at my attorneys' office, answering
17 questions during several interviews by my attorney and his staff either in person or via telephone
18 related to the case, and locating and submitting documents to my attorney in support of the
19 claims.
20

21 5. Throughout this litigation, I made myself available for a full-day mediation. This
22 mediation ended with a mediator's proposal. During the mediation, I remained involved and
23 provided information and details about VREG's practices and policies in support of the
24 representative action claims so that the claims could be maximized for the aggrieved employees.
25 I also made myself available to complete the settlement agreement and finalize the terms of the
26 settlement agreement and execute the settlement agreement.
27
28

**DECLARATION OF KATHERYN ENRIQUEZ IN SUPPORT OF MOTION FOR
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6. In this litigation, I was committed throughout the entire process to ensure that the Private Attorney General Act members were treated fairly. I would estimate that I devoted approximately 40 hours to the prosecution and resolution of these claims.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 20 day of July 2022 in California.


Kathryn Enriquez (Jul 21, 2022 16:22 PDT)

Katheryn Enriquez, Declarant

Declaration of Katheryn Enriquez in Support of Motion for PAGA Approval-Final

Final Audit Report

2022-07-21

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