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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

10 DARLENE TORRES, LEANNA RUVALCABA,
and MARCELLA BERNAL, individuals, on their
11 own behalf and on behalf of all similarly
aggrieved employees,

12 Plaintiffs,

13 v.

14 MONETARY MANAGEMENT OF
CALIFORNIA, INC., a foreign corporation; and
15 DOES 1 through 100, inclusive,

16 Defendants.

Case No.: 21STCV09917

*[Assigned for all purposes to the Hon. William
F. Highberger, Dept. 10]*

**DECLARATION OF LEANNA RUVALCABA
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS AND
PAGA ACTION SETTLEMENT**

Date: June 30, 2023
Time: 11:00 a.m.
Dept.: 10

Complaint filed: March 12, 2021
FAC filed: June 9, 2022
Trial date: None set

DECLARATION OF LEANNA RUVALCABA

I, Leanna Ruvalcaba, hereby declare as follows:

1. I am a plaintiff and Class Representative in the above-captioned class and representative action, *Torres, et al. v. Monetary Management of California, Inc., et al.*, Los Angeles County Superior Court, Case No. 21STCV09917.

2. I am over 18 years of age and make this declaration based on my personal knowledge. If called as a witness, I could and would testify competently thereto.

3. This declaration is submitted in support of Plaintiffs' Unopposed Motion for Final Approval of Class and PAGA Action Settlement.

4. Defendant Monetary Management of California, Inc. ("Money Mart") is a payday lender. I was as a non-exempt Customer Service Representative for Money Mart at its check-cashing facility in Hemet, California, from June 2018 until March 2021.

5. I seek to represent current and former non-exempt employees who worked for Money Mart in California and were subject to the same uniform policies and procedures with respect to timekeeping and payroll.

6. It was a very difficult decision for me to bring this lawsuit against Money Mart and put my name out there as a class representative in this case. Despite my concerns about how a lawsuit could potentially affect my job prospects, I believe that Money Mart should be held accountable for how they treat their employees and decided to pursue these claims.

7. Since retaining my attorneys, I have been actively involved with the case. For instance, I spent a significant amount of time looking for and reviewing documents and speaking with the other plaintiffs and my attorneys regarding the facts of the case. I also spent time reaching out to other former employees to gather evidence about their similar experiences at Money Mart. Moreover, throughout the litigation, I have maintained regular contact with my attorneys and received updates from them. I spent time being on call by the phone during the mediation, and my attorneys kept me informed about all settlement negotiations and sought my opinion. I have reviewed the proposed settlement and conferred extensively with my attorneys about its pros and cons. I estimate that I have spent at least 100 hours being involved in this case.

1 8. Before and during the litigation, I was advised by my attorneys about my duties and
2 responsibilities as a representative for other current and former employees. I have taken these duties
3 seriously and was actively involved in my case throughout. I understand the factual allegations, and, as
4 far as I am aware, my experience is typical of Money Mart's employees in California. I have no interest
5 that is adverse to, or even substantially different from, any other employee.

6 9. I was never offered anything to serve as the class representative, and I understand that my
7 duty to the class is ongoing until the litigation is fully resolved. I do not anticipate receiving any benefit
8 as a result of my participation other than my individual class member award, and if approved, the requested
9 service award. Ultimately, I believe the settlement is fair, adequate, and reasonable because it holds Money
10 Mart accountable and will actually provide money to the proposed class, sooner rather than later.

11
12 I declare, under penalty of perjury under the laws of the State of California, that the foregoing is
13 true and correct to the best of my belief and knowledge.

14 Executed on 6/1/2023 in Hemet, California.

15 DocuSigned by:

16 *Leanna M. Ruvalcaba*

17 Leanna Ruvalcaba
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