

Taras Kick (SBN 143379)
Taras@kicklawfirm.com
Gregory Taylor (SBN 272309)
Greg@kicklawfirm.com
THE KICK LAW FIRM, APC
815 Moraga Drive
Los Angeles, California 90049
Telephone: (310) 395-2988
Facsimile: (310) 395-2088

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

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

Plaintiffs,

v.

MONETARY MANAGEMENT OF
CALIFORNIA, INC., a foreign corporation; DFC
GLOBAL CORP., a foreign corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 21STCV09917

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

**DECLARATION OF DARLENE TORRES IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: January 17, 2023
Time: 1:30 p.m.
Dept.: 10

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

DECLARATION OF DARLENE TORRES

I, Darlene Torres, hereby declare as follows:

1. I am a plaintiff and proposed 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 Preliminary Approval of Class Action Settlement.

4. Defendant Monetary Management of California, Inc. ("Money Mart") is a payday lender. I have worked as a non-exempt Customer Service Representative for Money Mart at its check-cashing facility in Hemet, California, since March 20, 2018.

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. 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.

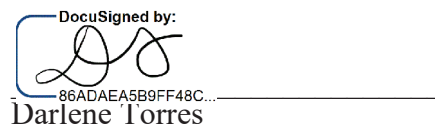
7. Before and during the litigation, I was advised by my attorneys about my duties and responsibilities as a representative for other current and former employees. I have taken these duties seriously and was actively involved in my case throughout. I understand the factual allegations, and, as far as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

8. Throughout the litigation, I have maintained regular contact with my attorneys and received updates from them. My attorneys kept me informed about all settlement negotiations and sought my opinion, including with respect to mediation. I have reviewed the proposed settlement and conferred extensively with my attorneys about its pros and cons. I was never offered anything to serve as the class representative, and I understand that my duty to the class is ongoing until the litigation is fully resolved.

1 Ultimately, I believe the settlement is fair, adequate, and reasonable because it holds Money Mart
2 accountable and will actually compensate the proposed class, sooner rather than later.

3
4 I declare, under penalty of perjury under the laws of the State of California, that the foregoing is
5 true and correct to the best of my belief and knowledge.

6 Executed on 3/29/2022 in Hemet, California.

7
8  DocuSigned by:
86ADAE5B9FF48C...
9 Darlene Torres