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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN JOAQUIN

JODIE BLANTON JR., YAZMIN CORTES,
and GABRIELA ESCRIBA, individually, on
a representative basis, and on behalf of all
others similarly situated;

Plaintiffs,

vs.

COMMUNICATIONS TEST DESIGN,
INC., a Pennsylvania Corporation; and
DOES 1 through 20, inclusive;

Defendants.

Case No.: STK-CV-UOE-2021-0005136
*[Assigned to the Hon. Robert T. Waters,
Dept. 11B, for all purposes]*

**DECLARATION OF YAZMIN CORTES
IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing:

Date: August 23, 2023
Time: 9:00 a.m.
Dept.: 11B

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1 I, Yazmin Cortes, state and declare:

2 1. I am the Plaintiff in the in the above captioned action and have personal
3 knowledge of all matters stated herein and could competently testify thereto.

4 2. I make this declaration in support of the motion for preliminary approval of the
5 class action settlement reached in this matter. As discussed herein, I believe that the settlement is
6 fair and reasonable and constitutes a fair resolution of the claims alleged.

7 3. I was employed by Defendant from February 2019 through September 2022.
8 During my employment, there were several practices that I believe violated California law.
9 Therefore, I researched attorneys and contacted Lauby, Mankin & Lauby LLP. Although I did
10 not think I was being paid correctly and that the Defendant was not properly following labor laws,
11 I was unsure if I wanted to bring a lawsuit because of the risk of stepping forward as a whistle
12 blower, since this could jeopardize my livelihood in the industry and make it difficult to find
13 future jobs. Nevertheless, because I did not think that myself or the other employees were being
14 paid correctly for the work we performed, I retained Lauby, Mankin & Lauby LLP to move
15 forward with this case.

16 4. After retaining my attorneys, I understood that I had two options: I could pursue
17 my individual case – including claims for and attempt to maximize my personal recovery, or I
18 could bring a class/representative action and put the interests of the class ahead of my own. The
19 decision of whether to bring my individual claims or to bring a class action put me in a tough
20 spot, because on the one hand, I wanted to hold the company accountable for how they treated
21 me and, on the other hand, I wanted to help other employees that were not paid correctly. And I
22 knew that, if I wanted to bring a class action, I would need to put the interests of the class first to
23 better serve the class. In the end, in the interest of helping all employees that were subjected to
24 the wage violations, I decided to help everyone by bringing a class/representative action.

25 5. Further, when entering into the retainer agreement, I executed a document
26 agreeing to abide by the Duties of a Class Representative as set forth in **Exhibit A**, attached
27 hereto.
28

1 6. Since first initiating this action, I estimate that I have spent at least 40 (40) hours
2 engaged in activities to benefit the class. I have assisted my attorneys in numerous ways, including
3 helping to explain and discuss the company's practices and their general practices and procedures,
4 locating and analyzing company documents, and communicating with other class members. These
5 efforts occurred through numerous meetings with Class Counsel, telephone conferences, letters,
6 emails, and text communications. I also assisted in preparation for mediation and helped obtain a
7 positive result for the class.

8 7. I respectfully request that the Court approve the agreed-upon service award. I
9 agreed to set aside my personal interests and to put the interests of the class ahead or on par with
10 my own. In doing so, and by successfully bringing this case as a class action, I helped to obtain a
11 highly beneficial settlement for the class members.

12 8. I also believe that the requested service award is fair and reasonable given that I
13 have faced substantial risks and made numerous sacrifices to obtain this class action settlement.

14 9. For example, filing this lawsuit and being a whistle blower was stressful on a day-
15 to-day basis as I have constantly worried about the risk that this case could impact my ability to
16 find future jobs.

17 10. Additionally, as a condition of this class action settlement, I was required to
18 mutually separate from my employment with the Defendant.

19 11. Therefore, I believe that the requested service award is justified based on the time
20 I spent on the case, the risk and stress I faced, as well as my decision to waive my separate
21 individual claims in order to secure this highly beneficial class action settlement.

22 I declare under the penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct. Executed on Jul 26, 2023, in Hesperia (city),
24 California.

25 
26 Yazmin Cortez (Jul 26, 2023 05:12 PDT)
27 Yazmin Cortes
28

Cortes vs. CTDI

Final Audit Report

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