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[additional counsel listed below]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF IMPERIAL

PRISCILLA LOPEZ,

Plaintiffs,

vs.

GEO SECURE SERVICES, LLC, a Florida
Limited Liability Company; and DOES 1-10,
inclusive,

Defendants.

AND ALL CONSOLIDATED LITIGATIONS.

Case No. ECU002060

**DECLARATION PRISCILLA LOPEZ IN
SUPPORT OF PLAINTIFFS' UNOPPOSED
MOTION FOR FINAL APPROVAL OF (1)
CLASS ACTION SETTLEMENT; (2)
ATTORNEYS' FEES AND COSTS; and (3)
CLASS REPRESENTATIVE AWARD**

Date: May 9, 2024
Time: 8:30 a.m.
Dept.: 5
Judge: Hon. Jeffrey B. Jones
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12 Attorneys for Plaintiff NICKOLAS ORTIZ

1 I, Priscilla Lopez, hereby declare:

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3 1. I am the named Plaintiff in the above-captioned matter. I have personal knowledge of the
4 facts set forth in this declaration and if called to testify as a witness, I could and would do so. I
5 make this declaration in support of Plaintiff' Unopposed Motion for Final Approval of Class
6 Action Settlement, Attorneys Fees and Costs, and Class Representative Award

7 2. To my recollection, I personally met with my Attorneys (usually Mr. Sullivan) on at least 5
8 occasions. Several of those meetings lasted in excess of 2 hours.

9
10 3. During these meetings, I would review and explain certain documents numerous documents
11 turned over by Defendants from my employment and explain my role (as well as others) during
12 work. I also helped Mr. Sullivan identify numerous other employees who could support the claims
13 I was making in this lawsuit. I contacted many of these individuals myself to verify their
14 willingness to participate.

15 4. I also spoke with my attorneys on the phone, on at least 11 other occasions.

16
17 5. I agreed to have my deposition taken, and spent several hours prepping for it with my
18 attorneys. I also spent significant time reviewing the settlement documentation and discussing the
19 settlement with my attorneys.

20 6. In total, I estimate that I spent at least 40 hours related to the above mentioned tasks directly
21 working with my attorneys. I also spent at least another 8-10 hours of my own time gathering
22 evidence and outlining issues that I later shared with my attorneys.

23 7. I was counseled by my attorneys, when I decided to move forward with this case, of the
24 potential stigma of being a Class Representative in a class action dispute, as this is a publicly filed
25 lawsuit.

1 8. I was also advised when I brought this case that had we lost, I could have been personally
2 liable for paying all of Defendants' costs. I was further advised this could be well into the tens of
3 thousands of dollars on this type of case.

4 9. Despite these risks I was committed to achieving a settlement that would benefit all
5 employees working for GEO.

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7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct. Executed this 16th day of April , 2024 at El Centro, California.

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DocuSigned by:
Priscilla Lopez
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PRISCILLA LOPEZ