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Attorneys for Plaintiff EVA ROCKWELL
 on behalf of herself and all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SHASTA**

EVA ROCKWELL on behalf of herself and all
 others similarly situated

Plaintiff,

vs.

CALIFORNIA MENTOR FAMILY HOME
 AGENCY, LLC., a California corporation, and
 DOES 1 through 50, inclusive,

Defendant.

Case No.: CVCV21-0197240-001

**DECLARATION OF EVA ROCKWELL IN
 SUPPORT OF PLAINTIFFS' MOTION FOR
 FINAL Y APPROVAL OF CLASS ACTION
 SETTLEMENT**

DECLARATION OF EVA ROCKWELL

I, Eva Rockwell, declare as follows:

1. I am a Named Plaintiff and Class Representative in the case of *Eva Rockwell v. California Mentor Family Home Agency, LLC et al.*, (Shasta County Case No. SCRDCVCV21-0197240-001.) I make this declaration on the basis of my personal knowledge and if asked to testify thereto I could and would do so.

2. I was employed by California Mentor Family Home Agency, LLC. ("California Mentor") from on or about May 2016 through on or about June 4, 2020. During my employment, I occupied a

1 non- exempt position as a service coordinator.

2 3. Prior to retaining the law firm of James Hawkins APLC to redress the grievances that I
3 had against California Mentor, I was made aware of the advantages and disadvantages of litigation. I
4 was also made aware of my responsibilities as both a Plaintiff and a class and PAGA representative
5 prior to filing the class action complaint which was filed on or about May 5, 2021. I accepted the
6 responsibility and agreed to move forward. I pledged to participate actively in the lawsuit.

7 8. During the litigation of this case, I have continuously interacted with my attorneys to
8 discuss the status of the case. I provided relevant oral and documentary information necessary to
9 prosecute this case. By way of example, I searched for and provided relevant documents pertaining to
10 my employment with Defendant and engaged in multiple discussions with my attorneys regarding my
11 employment. These discussions include, but are not limited to, the following topics: the policies,
12 practices and specific working conditions at California Mentor. I have also had numerous discussions
13 with my attorneys regarding the progress of this case.

14 9. By agreeing to bring this action, I formally accepted the responsibilities of representing
15 the interests of all similarly situated employees in California and willingly chose to assume risks and
16 potential costs that I alone might have to bear if judgement would have been rendered in favor of
17 Defendants.

18 10. As part of the settlement agreement, I also signed a general release releasing all claims I
19 have or may have against California Mentor which is far broader than the release by class members. The
20 class representative service payment also serves as compensation for agreeing to a full, general release
21 of all claims against California Mentor.

22 11. I also risked the potential stigma of being a named plaintiff in a representative action
23 labor dispute which could affect my further employability in the industry or with any prospective
24 employer who learns of my lawsuit against a former employer.

25 12. The class representative service payment, subject to court approval, is Seven Thousand
26 Five Hundred Dollars (\$7,500). I believe that this amount is fair and reasonable in light of the risks
27 undertaken (both personal and financial) in litigating this matter as a class action and PAGA
28

1 representative, as well as the time and effort I have expended in doing so, which have resulted in a
2 favorable outcome to the class members and aggrieved employees.

3
4 I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on
5 January 10, 2024, at Glendive, Montana.

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7 DocuSigned by:
8 *Eva Rockwell*
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Eva Rockwell