

1 ZACK I. DOMB, SBN 265185
E-Mail zack@dombrauchwerger.com
2 DEVIN RAUCHWERGER, SBN 274234
E-Mail devin@dombrauchwerger.com
3 ERIC Y. HAHN, SBN 311771
E-Mail eric@dombrauchwerger.com
4 **DOMB & RAUCHWERGER LLP**
1055 East Colorado Blvd., Fifth Floor
5 Pasadena, California 91106
Telephone: (213) 537-9225
6

7 JOANNA GHOSH, SBN 272479
E-Mail: joanna@calljustice.com
8 VARTAN MADOYAN, SBN 279015
E-Mail: vartan@calljustice.com
9 HELENE MAYER, SBN 332975
E-Mail: helene@calljustice.com
10 **LAWYERS for JUSTICE, PC**
450 N Brand Blvd, Ste 900
Glendale, California 91203
11 Tel: (818) 265-1020 / Fax: (818) 265-1021

12 Attorneys for Plaintiffs
Stephanie McCoy, Brittney Rourke
13 and the Proposed Class

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF RIVERSIDE**

16 STEPHANIE MCCOY, individually, and
on behalf of other members of the general
17 public similarly situated and on behalf of
other aggrieved employees pursuant to the
18 California Private Attorneys General Act;
BRITTNEY ROURKE, individually, and
19 on behalf of other members of the general
public similarly situated;
20

21 Plaintiffs,

22 vs.

23 VBR DHS MANAGEMENT, LLC, a
California limited liability company; and
24 DOES 1 through 100, inclusive,

25 Defendants.
26
27
28

Case No. CVRI2104222

**DECLARATION OF STEPHANIE MCCOY
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Hearing Information:

Date: October 27, 2025
Time: 8:30 a.m.
Dept.: 1
Judge: Hon. Harold Hopp

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

2

3
4
5
6

7
8
9
0

- 1
- 2

3
4

5
6
7
8
9
10
11

22
23
24
25
26

27
28

1 a living in the future. I believe employers generally do not favor individuals who file lawsuits
2 against their former employers. However, I decided that being a named plaintiff in this Action
3 was the right thing to do in order to make sure that this did not continue happening to current
4 employees and to ensure that both current and former employees were able to get some recovery
5 for what I believe were unfair issues with pay.

6 8. After I signed up, I was contacted numerous times by Lawyers for Justice as they
7 prepared the Complaint. Once a draft was prepared, I thoroughly reviewed the Complaint that
8 was to be filed and had discussions with Lawyers for Justice about its contents.

9 9. As a responsible representative, I have been thoroughly involved in the case. I
10 asked Lawyers for Justice to regularly keep me updated regarding the progress being made on the
11 case. I also reviewed documents that my counsel received from Defendant regarding my
12 employment so that I could answer various questions that my attorneys had for me about them.

13 10. Once the Parties agreed to mediate the case, I had additional discussions with my
14 counsel regarding what mediation would look like as well as settlement possibilities. I also reviewed
15 the mediation statement that my attorneys prepared and gave them my additional input based on my
16 time working for Defendant.

17 11. During the day of mediation, they kept me apprised of how the discussions were going
18 and after mediation, I had an extensive call with my attorneys where they debriefed me on the day
19 and next steps in the case.

20 12. Once a settlement was reached, a Memorandum of understanding was executed and
21 Lawyers for Justice discussed with me bringing in Domb & Rauchwerger LLP to help with the
22 settlement process. I separately looked into the law firm of Domb & Rauchwerger LLP to make sure
23 that I was comfortable with the firm coming on to handle the settlement portion of the case.

24 13. Domb & Rauchwerger LLP ended up preparing a lengthy settlement agreement which
25 I spent a significant amount of time reviewing and discussing with my attorneys.

26 14. I also spent time providing information to my attorneys for purposes of drafting my
27 declarations in support of the motions for preliminary and final approval.

28 15. I understood from the beginning of the case that I would have an important duty

1 to look out for the best interests of the class. I also understood from the start of considering this
2 case, based on my discussions with my lawyers, that I would have to take on significant
3 responsibilities and burdens for the benefit of the class, which could include having my deposition
4 taken to give testimony under oath, that I could face the possibility of subpoenas being issued to
5 former and current employers, and that I might have to testify in Court for the benefit of not only
6 myself but the other employees.

7 16. I have taken my responsibility as a Representative seriously and will continue to
8 do so. I have learned about the laws relating to payment of wages, requirements for meal and rest
9 periods, and the other issues in this Action.

10 17. I believe that I had a similar experience with Defendant compared to the other non-
11 exempt employees because we were all subjected to the same policies and practices.

12 18. I agreed to enter into a broader individual release than that agreed to by the other Class
13 Members. Despite this, I have not received any compensation to date for my services helping to
14 obtain the settlement in this matter. I estimate that I spent approximately 45 hours on this matter,
15 including working on the tasks discussed above, such as mediation and settlement. The notice that I
16 received from the Administrator as part of the Settlement stated that I am estimated to receive \$948.57
17 as my share of the Individual Settlement Payment and Individual PAGA Payment.

18 19. Based on my efforts in this case, finding a lawyer, organizing and providing
19 numerous documents to my lawyer that were very helpful to the case, numerous calls and emails
20 with my lawyer, being named as a plaintiff in a lawsuit, and participating in the mediation process,
21 I believe the requested incentive payment of \$5,000 for my time is appropriate.

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct.

24 Executed on 10 / 02 / 2025, in Riverside County, California.

25
26 

27 STEPHANIE MCCOY
28