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Attorneys for Plaintiff DIVA ALFARO

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

DIVA ALFARO on behalf of herself and all
similarly situated persons, and the general
public,

Plaintiff,

v.

PARAMOUNT RESIDENTIAL MORTGAGE
GROUP, INC.; and DOES 1 through 25,
inclusive,

Defendants.

CASE NO. CVRI2103949

*Assigned for all purposes to the
Honorable Harold Hopp, Dept. 1*

**DECLARATION OF DIVA ALFARO IN
SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, CLASS
REPRESENTATIVE ENHANCEMENTS,
ATTORNEYS' FEES AND COSTS AND
JUDGMENT THEREON**

Hearing Date: November 17, 2023

Time: 8:30 a.m.

Dept: 1

DECLARATION OF DIVA ALFARO

I, DIVA ALFARO, declare that:

1. I am a competent adult, over the age of eighteen (18) and am a plaintiff and class representative in the above-entitled action. I have personal knowledge of the facts stated herein except as to those matters stated upon information or belief, and, as to those matters, I believe them to be true. If called as a witness, I could and would testify truthfully and competently to the matters stated herein. Capitalized terms used but not defined in this declaration have the same definition as used in the accompanying Motion for Final Approval and Application for Attorneys' Fees and Costs.

2. On August 27, 2021, by and through my attorneys, I filed this lawsuit.

3. Throughout the case, I have been actively involved in pursuing information that could support the case, and ultimately, I believe my efforts helped the class members. My efforts included my initial consultation with my attorneys, searching and locating documents, reviewing documents securing participation of additional class members, maintaining regular contact with my attorneys, and reviewing all relevant information and documentation provided to me by my attorneys.

4. I am not related to anyone in this action and am I not associated with any person, who work for the law firm of Nathan & Associates, APC and/or Righetti Glugoski P.C. I have not received and will not receive any undisclosed compensation in this case. The only compensation I will receive is whatever amount this Court awards me as Class Representative Service payment, as well as my share of the Settlement Fund as a Class Member and PAGA Member.

5. As discussed below, I request that the Court award me a Class Representative service Payment of Five Thousand Dollars (\$5,000.00). I feel this amount is justified by my expenditure of time, and the personal risk I assumed. I suffered risks to future employment by filing this case. I understand from my attorneys the the excellent results in this case are unusual compared to most class cases, which I believe also supports my service award.

6. During my employment with Defendants, I was not provided lawful rest breaks or compensation in lieu of, I was not provided itemized accurate wage statements, I was not

1 reimbursed for business expenses, and I am owed penalties under the labor code. The Class
2 Members suffered the same or substantially similar injuries as me.

3 7. I suffered additional violations as a result of Defendant's actions that were not
4 included in the complaint. I executed a general release of all of my claims against Defendant in
5 exchange for payment of \$20,000.00

6 8. From April to July 2021, I contacted Reuben Nathan and told him about the details
7 of my experiences and workplace related issues while employed by Defendant. Nathan &
8 Associates requested for me to gather my wage statements, employment agreement, time records,
9 and other employment documents with Defendants. The calls with Nathan & Associates, APC
10 lasted approximately 30 minutes. During the next few weeks I spent 10 hours looking for the list of
11 documents in my physical files located in various places throughout my home.

12 9. In August 2021, I spent approximately 15 hours searching for documents on my
13 computer and emails. I located several documents that appeared to fit the description of the
14 documents requested by Nathan & Associates. After reading through emails and attachments, I
15 located multiple separate documents that I provided to Nathan & Associates.

16 10. In or about August, 2021, I signed a retainer agreement and spoke with Reuben
17 Nathan of Nathan & Associates for approximately 30 minutes regarding the documents I provided.

18 11. In or about September 2021, after conferring with Nathan & Associates, APC, I also
19 retained Rightetti Glugoski P.C.

20 12. During the time of August 2021 through March 2022, I spent approximately 15
21 hours with Reuben Nathan of Nathan & Associates, APC including providing him with information
22 he requested to create a discovery plan, prepare litigation strategy for the case, conferring and
23 participating in opposing motion to compel arbitration and settlement discussions, Motion for
24 Preliminary Approval, and final approval.

25 13. In or about January 2023, I received a copy of the Memorandum of Understanding
26 ("MOU") from my attorney. After asking questions and consulting with my attorney, I executed the
27 MOU. I spent 3 hours on this activity. The reason for the length of time I spent on this activity was
28 due to the fact that my individual claims far exceeded my recovery through the class action.

15. While my attorneys were preparing the Motion for Preliminary Approval, they called me several times to confirm certain information and have me located documents to support the motion which took 2 hours.

17. I have spent a total of approximately 51 hours in serving as a class representative in this case as set forth in the details above.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on October 19, 2023, at _____, California.

DocuSigned by:
Dina Alfaro
EE9696C0A9EE435
Dina Alfaro