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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF RIVERSIDE**

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

13 Plaintiff,

14 v.

15 PARAMOUNT RESIDENTIAL
16 MORTGAGE GROUP, INC.; and DOES
17 1 through 25, inclusive,

18 Defendants.

Case No. CVRI2103949

*Assigned for all purposes to the
Honorable Harold Hopp, Courtroom 10*

**DECLARATION OF DANIEL LEWIS IN
SUPPORT OF PLAINTIFF'S UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Hearing Date: July 7, 2023
Time: 8:30 a.m.

Reservation ID: 993285268943

[Complaint filed: August 27, 2021]

20 I, Daniel Lewis, hereby declare as follows:

21
22 1. I am employed by Paramount Residential Mortgage Group, Inc., in the capacity
23 of Director of Human Resources. My duties and responsibilities include overseeing the
24 application, hiring and orientation of employees who work in California. I have personal
25 knowledge of the following facts and make this declaration of my personal knowledge and could
26
27
28

1 testify thereto if called as a witness as follows:

2 2. I am intimately familiar with the hiring processes employed by PRMG and the
3 minimum requirements necessary to be employed by PRMG as a non-exempt, hourly employee
4 as well as a loan officer. The requirements are made public through job postings and during the
5 interview and application process. The requirements include a minimum education level,
6 English proficiency and age requirement.

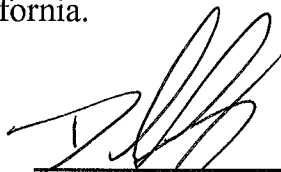
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8 3. There are approximately 1,132 class members that would be covered by this
9 settlement.

10 4. The employees at issue range from 18 years old to over 40 years old and have all
11 provided proper identification with information concerning their ages.

12 5. Each of the jobs for which they were hired require a high school diploma or
13 equivalent. When we hire employees, we confirm that they need this minimum standard. In
14 hiring these individuals, we confirmed that each met the minimum education level standard.

15 6. Given that we are in the mortgage industry and deal with the public, these
16 positions mandate a proficiency in the English language. An inability to speak English
17 proficiently would prevent the individual from being able to do the job for which they were
18 hired. Every class member covered by this settlement speaks English fluently.

19 I declare under penalty of perjury that the foregoing is true and correct. Executed this
20
21 28 June 2023, at Riverside, California.

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23
24
25 
Daniel Lewis