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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA**

CLAUDIA MONTAR FLORES, individually,
and on behalf of all others similarly situated,

Plaintiff,

v.

DARENSBERRIES, LLC, a California Limited
Liability Company, and DOES 1 through 10,
inclusive,

Defendant,

Case No.: 21CV04814
Assigned to: Hon. James F. Rigali, Dept. 2
Complaint Filed: December 6, 2021
Trial Date: Not set

PAGA REPRESENTATIVE ACTION

**DECLARATION OF CLAUDIA
MONTAR FLORES IN SUPPORT OF
PLAINTIFF'S MOTION TO APPROVE
THE PAGA SETTLEMENT AND ENTER
JUDGMENT**

DECLARATION OF CLAUDIA MONTAR FLORES

I, Claudia Montar Flores, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

2. I am the named “Plaintiff” in this action filed pursuant to the Labor Code Private Attorneys General Act of 2004 (“PAGA”) and submit this declaration in support of Plaintiff’s Motion to Approve the PAGA Settlement and Enter Judgment (the “Motion”). Because I believe I have provided invaluable assistance during the course of this case, I am hopeful that the Court will approve my request for a \$10,000.00 service payment for my role as the PAGA Representative.

3. I am a former employee of Defendant Darensberries, LLC (“Defendant”). I worked for Defendant from approximately April 2008 to approximately July 2020 as a non-exempt employee. Throughout the entirety of my employment, I was subject to all of Defendant’s allegedly unlawful policies and practices asserted in this action and the PAGA Notice sent to Defendant and the Labor and Workforce Development Agency (“LWDA”).

4. I initiated this lawsuit because I was concerned that Defendant owed me money due to failing to properly pay me for all of the hours that I worked, I was not provided all of my meal and rest breaks, and I was not provided appropriate paid sick leave. While working for Defendant, my coworkers and I were asked to work long hours because of the amount of work, sometimes without taking meal and rest breaks and without receiving compensation for all hours worked. I also observed my co-workers working long hours without taking breaks. Furthermore, my co-workers and I were occasionally required to miss work due to injuries and/or illnesses but were not provided appropriate paid sick leave.

5. By representing myself and other similarly situated persons in this lawsuit, I hoped that I might be able to change Defendant’s policies to improve the working conditions of my coworkers. I also understood that it was my duty to represent the best interests of the State of California and the other aggrieved employees, know about the lawsuit, assist my attorneys, and keep updated on the case.

6. I have invested a lot of personal time and energy into this lawsuit. I made it a

1 priority to be actively involved because I wanted to do everything I could to assist my attorneys in
2 pursuing this case. I regularly communicated with my attorneys and their staff to discuss updates
3 on the case and to provide my attorneys with additional information.

4 7. I spent multiple hours looking for documents that my attorneys asked me to provide
5 to help this case. Throughout this case, I spent numerous hours looking for looking for documents
6 relevant to the case to send to my attorneys, including when I first contacted my attorneys, before
7 my attorneys filed the case, and before my case was mediated. I also spent time reviewing legal
8 documents in this case, including the retainer and settlement agreement, and discussed in detail the
9 settlement terms with my attorneys.

10 8. I also made myself available prior to and during the mediation for this case and I
11 kept in regular contact with my attorneys before and after the mediation to prepare to answer
12 questions about the case from the mediator and/or my attorneys.

13 9. I believe the settlement is a good settlement and I would recommend that the Court
14 approve it because I believe that this settlement is fair, adequate, and reasonable. I am glad that I
15 had the opportunity to represent myself and others in this lawsuit and that I was able to recover
16 money through a settlement for those affected. I have also observed my attorneys' work throughout
17 this case and I believe they have been thorough, diligent, prompt, courteous, and professional.

18 10. I estimate that I have spent **at least 45 hours working on this case** since I first
19 contacted Wilshire Law Firm, PLC.

20 11. I did not make the decision to pursue this lawsuit lightly. I was concerned by the
21 attention a publicly filed lawsuit, and especially a representative action, would attract. My name
22 will forever be associated with a lawsuit filed against my former employer. I am mindful that
23 prospective employers might find out that I sued Defendant and they could avoid hiring me because
24 of this lawsuit. In a competitive job market, this factor may weigh heavily against me.
25 Nevertheless, I felt that important rights were at stake and I wanted to help remedy any harm caused
26 and prevent similar potential future harm.

27 12. Standing up for myself and the rights of others was not an easy decision, and I am
28 relieved that this case is coming to an end.

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13. I respectfully request that the Court award me a \$10,000.00 service payment. I believe I helped represent other employees who may have been too afraid to speak up because they did not want to risk losing their jobs or the stigma of suing an employer. I believe this amount is fair compensation for my time and effort spent on this case and the risks to my future employment. In addition, I am subject to a broader release of claims than others and I believe I should be compensated more for releasing more claims.

14. I reviewed (and ultimately signed) the settlement agreement and my attorneys answered any questions I had about it.

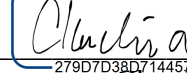
15. As far as I am aware, I have no conflicts of interest with any other employees covered by this Settlement or the Settlement Administrator, Apex Class Action Administration.

16. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

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 6/8/2026 at Maricopa, California.

DocuSigned by:



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Claudia Montar Flores