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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

STEPHANIE CUEVAS, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

TARLANI CORP., a California Corporation;
and DOES 1 through 20, inclusive;

Defendants.

Case No.: CIVSB2202953

*[Assigned to Hon. Jessica Morgan, Dept S26, for
all purposes]*

**DECLARATION OF PLAINTIFF
STEPHANIE CUEVAS IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

I, Stephanie Cuevas, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of all matters stated herein and could competently testify thereto. I make this declaration in support of the motion for final approval of the class action settlement. I believe that the settlement is fair and reasonable and constitutes a fair resolution of the claims alleged.

2. During my employment with Defendant, I thought that there were issues with my pay, the timeliness of my paychecks, and my meal and rest breaks. I started researching California law and contacted attorneys regarding issues with how I was paid.

3. I then contacted my attorneys (Lauby, Mankin & Lauby) and discussed these issues. As part of this discussion, I understood that I could either bring a class action to help all of the employees, but I would have to put their interests ahead of my own, or I could bring my

1 individual case and claims and attempt to maximize my individual recovery. This decision was
2 very difficult because I wanted to help everyone else that was wronged by the company, but I
3 also wanted maximize my individual recovery. I was also concerned that, if I brought this as a
4 class action, I might get labeled as a whistleblower, which might make it hard to find a job in the
5 future. I eventually decided that – despite the risks – it was important to bring these claims as a
6 class action to hold the company accountable for how they treated their employees.

7 4. I respectfully request that the Court approve the agreed-upon service award for
8 the following reasons.

9 5. First, I have spent at least 40 hours engaged in activities to benefit the class. I
10 have been an active participant in this litigation, including assisting my attorneys in various ways
11 and making myself available when needed. For example, I have assisted my attorneys by
12 compiling and analyzing substantial documentation regarding claims. I also helped to explain
13 and discuss the company’s practices and their general practices and procedures, locating and
14 analyzing company documents, among others. I also assisted in settlement discussions, helped
15 obtain a highly favorable result for the class, and reviewed all settlement documents and believe
16 that this settlement is fair for the class.

17 6. Second, I respectfully request that the Court approve the agreed-upon service
18 award because I agreed to set aside my personal interests and to put the interests of the class
19 ahead or on par with my own. In fact, as a condition of this class action settlement, I was
20 required to compromise on and waive all possible individual claims against the company.
21 However, to finalize this settlement, I put the interests of the class ahead of my own and agreed
22 to waive all of my claims against the company.

23 7. Third, by bringing this case as a class action, I undertook significant risks and
24 stresses at a high emotional cost without any guarantee of success. For example, filing this
25 lawsuit and being a whistle blower was stressful on a day-to-day basis as I have constantly
26 worried about the risk that this case could impact my ability to find future jobs. This stress/risk
27 lasted for the entire case, and I’m worried it will continue to make it hard to find a job in the
28 future since the case information is all available online. Furthermore, as a result of filing this

lawsuit, the company significantly reduced my job assignments, forcing me to leave in order to find a new job with consistent pay.

8. Fourth, and finally, bringing this case also came with a major financial risk because, if I lost the case, I would be required to pay the company's costs, and there was a chance they could try to make me pay their attorneys' fees as well.

9. Therefore, I respectfully request that the Court award the service award since that amount is justified based on the substantial time I spent on this case, as well as the risks and stresses I faced and will continue to face to secure this class action settlement to benefit the other employees.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on Sep 14, 2023, at Colton, California.

By:


Stephanie Cuevas (Sep 14, 2023 13:59 PDT)
Stephanie Cuevas