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Attorneys for Plaintiff ANNEKA WOLFE,
on behalf of herself and current and former aggrieve employees

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

VERONICA REDONDO, on behalf of all
Aggrieved Employees and the State of
California; ANNEKA WOLFE, on behalf of
all Aggrieved Employees and the State of
California; DANIEL ENRIQUEZ, on behalf
of all Aggrieved Employees and the State of
California; LISA DAMMAN, on behalf of all
Aggrieved Employees and the State of
California; and SHERWIN MOKTARI, on
behalf of all Aggrieved Employees and the
State of California.

Plaintiff,

vs.

VERGE MOBILE CA EE, LP, a California
limited partnership; VERGE MOBILE CA
GP, LLC, a California limited liability
company; and DOES 1 through 20, inclusive;

Defendants.

Case No.: CVRI2200827

*[Assigned to Hon. Judge Harold Hopp, Dept
1, for all purposes]*

**DECLARATION OF ANNEKA WOLFE
IN SUPPORT OF MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

**DECLARATION OF ANNEKA WOLFE IN SUPPORT OF MOTION FOR APPROVAL OF PAGA
SETTLEMENT**



DECLARATION OF ANNEKA WOLFE

I, Anneka Wolfe declare:

1. I am over the age of 18 and am the named Plaintiff and class representative in this matter. I have personal knowledge of the matters stated herein and if called and sworn as a witness, I would and could competently testify under oath thereto.

2. This declaration is submitted in support of Approval of the representative PAGA action settlement in this matter.

3. I worked for Defendant VERGE MOBILE CA EE, LP ("Defendant") as a non-exempt hourly employee from approximately May 2022 until on or about February 4, 2023.

4. From the time of the filing of the lawsuit, I have understood that this is a representative PAGA action lawsuit where I represent the interests of the State of California, and all current and former non-exempt, hourly employees of Defendant in California who worked at any time during the PAGA Period.

5. I believe while working for Defendant, I and all current and former non-exempt, hourly employees of Defendant in California who worked any time during the PAGA Period, were subject to the same policies and procedures regarding payment of minimum and overtime wages, meal and rest breaks, reimbursement of employment-related expenses, wage statements, and final payment of wages. I believe that the claims of all current and former non-exempt, hourly employees of Defendant in California who worked at any time during the PAGA Period are identical to mine because Defendant's policies and procedures applied to all of us.

6. I understand that I must continue to consider and protect the interests all current and former non-exempt, hourly employees of Defendant in California who worked at any time during the PAGA Period. I have been protecting the rights of myself and all current and former non-exempt, hourly employees of Defendant in California who worked at any time during the PAGA Period, since approximately May of 2023 when first I started looking for an attorney before this lawsuit was filed. I have been and continue to place the interest of all current and former non-exempt, hourly employees of Defendant in California who worked at any time during the PAGA

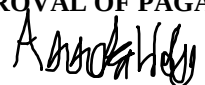


1 Period above my own. I do not have any interests that conflict with those of other Aggrieved
2 Employees.

3 7. I provided information and been available to my attorneys since approximately
4 May of 2023 when I was searching for my attorney. I have helped and been willing to support the
5 lawsuit in any way I can for the last approximately 31 months since May of 2023 when I began
6 searching for an attorney for the claims in this lawsuit. I have searched for an attorney, met with
7 my attorneys to see if they would represent me, met with my attorneys to discuss the Defendant's
8 policies, procedures, and practices for clocking in and out, paying wages for the hours that we
9 worked, meal and rest breaks, reimbursement of employment-related expenses, wage statements,
10 and final payment of wages. I spent time searching for policies and procedures that were given to
11 me during my employment, any timecards I had, any pay stubs I had, W2s, and other documents
12 related to my employment. I produced all the documents to my attorneys. I responded to almost all
13 of my attorneys' telephone calls and interviews and I met with them in person and/or
14 telephonically to discuss any questions they had about my employment and Defendant's policies
15 and procedures, or the documents I had provided to them. I made myself available during the
16 mediation session. Once the settlement agreement was finalized, I conferred with my attorneys on
17 multiple occasions to review and discuss the agreement before signing.

18 8. I also understand that in the event this matter proceeds to trial, I must come to court
19 to participate in the trial. I will come to court if I am needed and have been ready to perform any
20 responsibility that is necessary for this lawsuit. I know that I took a risk by filing this lawsuit
21 because if I lost, I would have to pay for all the costs incurred by the Defendant in the lawsuit. I
22 also have the risk of losing income for any time that I would have to spend fulfilling my
23 responsibilities including having to attend the trial. I also believe I have taken a risk by filing this
24 lawsuit because my employers in the future may find out that I sued my employer, and they may
25 not like it. The other employees will be receiving money from this lawsuit and they have not had
26 to file a lawsuit, look for an attorney, or take the risks that I have had to take.

27 9. I understand that the settlement we have reached in this case must be approved by
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the Court and I must protect the interests of all current and former non-exempt, hourly employees of Defendant in California who worked at any time during the PAGA Period.

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

Executed this 12/11/2025 day of December 2025, at Oceanside, California.



Anneka Wolfe

