

Brian J. Mankin, Esq. [CSB No. 216228]
brian@lmlfirm.com
Misty M. Lauby, Esq. [CSB No. 243009]
misty@lmlfirm.com
LAUBY, MANKIN & LAUBY, LLP
5198 Arlington Avenue, PMB 513
Riverside, CA 92504
Tel: (951) 320-1444 | Fax: (951) 320-1445

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 RIVERSIDE

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

Plaintiffs,

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. Harold Hopp, Dept 1, for
all purposes]*

**DECLARATION OF VERONICA
REDONDO IN SUPPORT OF MOTION
TO APPROVE SETTLEMENT
PURSUANT TO THE PRIVATE
ATTORNEYS GENERAL ACT OF 2004**

1 I, Veronica Redondo, state and declare:

2 1. I am a Plaintiff in the above-entitled action. I am fully familiar with the facts of
3 this case and hereby make this declaration in support of the dismissal of the class claims pled
4 herein (without prejudice). The matters set forth herein are based upon my personal knowledge
5 and if called upon as a witness, I could and would give competent testimony with respect to the
6 matters contained herein.

7 2. As to CMO ¶ H(2):

8 a. Since first initiating this action on behalf of the other employees, I believe that I
9 have more than adequately performed my duties as a representative. I have been
10 an active participant in this litigation, including assisting my attorneys in various
11 ways and making myself available when needed. For example, I have assisted my
12 attorneys by compiling and analyzing substantial documentation regarding the
13 claims in this case. I have also helped to explain and discuss the company's
14 practices and their general practices and procedures, locating and analyzing
15 company documents, among others. I have also reviewed all settlement
16 documents. Finally, I will continue to take all steps necessary to finalize this
17 settlement and obtain court approval.

18 b. Since first initiating this action, I estimate that I have spent more than 45 hours
19 engaged in activities to benefit the State and the Aggrieved Employees. I have
20 assisted my attorneys in numerous ways, including helping to explain and discuss
21 the company's practices and their general practices and procedures, locating and
22 analyzing company documents, preparing for and making myself available for the
23 all-day mediation (including discussing the company's general policies, practices,
24 and procedures), and then reviewing all settlement documents through this
25 approval process. These efforts occurred through numerous telephone
26 conferences, letters, emails, and text communications.

27 c. Filing this lawsuit and the concerns of being seen as a whistleblower was stressful
28 on a day-to-day basis as I have constantly worried about the risk that this could

1 impact my ability to find future jobs. I was worried that filing the case may get
2 me labeled as a whistleblower, resulting in retaliation and difficulty finding work
3 for the rest of my career. Additionally, I faced financial risk in bringing this case
4 because, if I lost the case, I would be required to pay the company's costs, and
5 there was a chance they could try to make me pay their attorneys' fees as well
6 (fortunately, because of the settlement, I did not have to incur any expenses in
7 prosecution of this action).

8 d. As a condition of this settlement, I was required to compromise on and waive my
9 separate individual claims of retaliation for reporting issues at the company.

10 Notably, I believe that my manager retaliated against me through discipline and
11 poor treatment after I voiced concerns. I was eventually forced to find a new job.

12 e. I do not know that the exact amount I expect to receive as a PAGA Aggrieved
13 Employee, however, I am informed that the average recovery for each member
14 will be approximately \$77.44.

15 3. I believe that request for the \$5,000 service award is justified based on (a) the
16 time I have spent on the case, (b) the risks I took in bringing this case, and (c) my agreement to
17 waive all of my individual claims for retaliation and wrongful termination. I respectfully request
18 that the Court approve the agreed-upon service award.

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

21 Executed on Dec 11, 2025, in RIVERSIDE, California.

22 

23 Veronica Redondo (Dec 11, 2025 16:10:55 PST)

24 Veronica Redondo
25
26
27
28