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Attorneys for Veronica Redondo, on behalf of all Aggrieved Employees and the State of California

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 PLAINTIFF LISA
DAMMAN IN SUPPORT OF MOTION
FOR APPROVAL OF PAGA
SETTLEMENT**

I, Lisa Damman declare as follows:

1. I am an adult over 18 years of age and one of the named Representative Plaintiffs in this consolidated action. If called upon as a witness, I would and could competently testify to those matters contained in this declaration based upon my handling and participation in this matter.

- 1 2. I make this Declaration in support of the Motion for Approval of PAGA Settlement. If
2 called upon as a witness, I would and could competently testify to those matters contained
3 in this Declaration based upon my participation as a Plaintiff in this matter.
- 4 3. I was employed by Defendant Verge Mobile CA, EE, LP (“Verge / Verge Mobile”) as a
5 full time, sales assistant manager from on or about September 13, 2021 to on or about
6 October 6, 2023. I was compensated \$16/ hourly, plus commissions as an hourly
7 nonexempt employee.
- 8 4. In this action, myself and the other co-Plaintiffs have asserted numerous violations of this
9 including assertions that Plaintiffs and the alleged Aggrieved Employees were not paid
10 all wages due, were not paid proper overtime wages; were not provided timely or duty
11 free rest and meal breaks; were not paid wages for every hour worked during each pay
12 period throughout the relevant PAGA period; alleging that Defendant failed to maintain
13 accurate employment records, that Plaintiffs and the alleged Aggrieved Employees were
14 not reimbursed for work related expenses for use of their personal cell phones for work
15 related communications; that Defendants failed to provide a day of rest; Defendant issued
16 noncomplete and inaccurate wage statements, and as to any such Plaintiffs and alleged
17 Aggrieved Employees who separated from Defendant’s employment during the PAGA
18 period, that they were not timely paid all wags due upon termination.
- 19 5. In or around Mid-December of 2023, I contacted attorney Jacob N. Whitehead
20 about my experience while employed by Verge Mobile and discussed issues, and
21 actions I experienced by the Defendants that I believed to be potentially unlawful.
22 Following an initial interview I was asked to provide Mr. Whitehead and his team
23 with any documents I had that would support my factual claims, which I did.
- 24 6. I had several follow up discussions with attorney Whitehead, and occasionally with
25 his staff members, wherein we discussed certain specific facts related to my former
26 employment with Verge Mobile, and potential legal claims associated with my
27 assertions.
28

- 1 7. Mr. Whitehead candidly detailed the potential risks and potential benefits of
2 participating in a lawsuit in a representative capacity on behalf of myself and other
3 similarly-situated employees, I understood his explanation and I agreed to move
4 forward and participate in the lawsuit.
- 5 8. Since engaging W Employment Law, I have proactively made myself available to assist
6 Mr. Whitehead and/ or his staff to provide or clarify factual details surrounding the alleged
7 facts.
- 8 9. Overall, I estimate that I have spent approximately 10-12 hours researching and
9 assisting with the investigation and litigation of this case, by providing factual
10 information and any documents in my possession, signing and/ or verifying
11 authenticity of documents when asked, related to my prior employment with
12 Defendants and in general assisting the attorney including conferring with my
13 attorneys regarding settlement discussions. All of these efforts, contributions and
14 discussions were performed on my own personal time.
- 15 10. The proposed PAGA settlement seeks approval of a Service Enhancement Award for
16 myself and for each of the other named representative plaintiffs in the amount of Five
17 Thousand Dollars (\$5,000) each (\$25,000.00 total) in exchange for our full general
18 release.
- 19 11. In sum, in agreeing to serve as Representative Plaintiff, I knowingly assumed the
20 responsibilities commensurate with the lawsuit, but in addition, I knowingly
21 assumed the additional potential reputational risks that I would be taking on by
22 pursuing this Action as a named plaintiff and proposed PAGA representative and
23 with respect to my future employment opportunities, since filing a public lawsuit
24 related to my prior employment could affect my ability to obtain jobs in the future.
25 A future employer might conduct a background check on me or find out about my
26 participation in this lawsuit against a previous employer, which could prevent me
27 from being hired. Therefore, I believe that the requested Representative Service
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1 Award in the amount of \$5,000.00 for each named Representative Plaintiff is fair
2 and reasonable given the time and efforts expended on behalf of the other alleged
3 PAGA Members, including the risks I faced and will continue facing in serving as
4 a named Plaintiff and proposed PAGA representative plaintiff.

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

7
8 Executed on this 8th day of December 2025, at Irvine, California.

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11 _____
Lisa Damman