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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – STANLEY MOSK COURTHOUSE**

GUADALUPE MOYA; individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the California
Private Attorneys General Act;

Plaintiff,

vs.

USRG (CALIFORNIA) INC., a California
corporation; U.S. RESIDENTIAL GROUP,
LLC, an unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: BC625588

Honorable Robert B. Broadbelt
Department 53

CLASS ACTION

**DECLARATION OF GUADALUPE
MOYA IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT, ATTORNEYS' FEES,
COSTS, AND ENHANCEMENT
PAYMENT**

[Notice of Motion and Motion for Final
Approval of Class Action and PAGA
Settlement, Attorneys' Fees, Costs, and
Enhancement Payment; Declaration of Class
Counsel (Edwin Aiwazian); Declaration of
Settlement Administrator (Cassandra Cita);
and [Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Reservation No.: 409379171477
Date: August 23, 2019
Time: 10:00 a.m.
Department: 53

Complaint Filed: June 30, 2016
FAC Filed: February 20, 2019
Trial Date: None Set

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1 case, identifying potential witnesses, providing my attorneys with documents and information
2 concerning the case, and also describing policies, practices, and procedures of USRG. In
3 addition, during the discovery phase of this case, I spent at least an additional 7 hours reviewing
4 U.S. Residential Group LLC's discovery requests and locating documents for my attorneys and
5 providing them with responses.

6 5. On March 24, 2017, I attended a full day of deposition that lasted approximately
7 7.5 hours. I spent at least 2 hours preparing for the deposition and approximately 3.5 additional
8 hours traveling to and from the deposition. After the deposition, I spent at least 2 hours
9 reviewing my testimony and discussing the contents of the deposition transcript with my
10 attorneys.

11 6. As far as the settlement is concerned, I was available to review documents and
12 answer any questions my attorneys had. I spent about 2 hours reviewing the settlement
13 agreement and about 2 hours asking questions and discussing the potential settlement with my
14 attorneys before signing the settlement agreement.

15 7. I believe that I have done everything that my attorneys have asked of me and have
16 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
17 obtained in this case, and as a named Plaintiff, I respectfully request that the Court award me an
18 enhancement payment in the amount of \$5,000.00 for my active participation in this case.
19 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
20 reasonable.

21 8. I am not related to anyone associated with Lawyers *for* Justice, PC.

22 9. I have not entered into any undisclosed agreements, nor have I received any
23 undisclosed compensation in this case. The only compensation I will receive is whatever amount
24 the Court awards as an enhancement payment, as well as my share of the settlement fund as a
25 class member.

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

Executed this 27 day of November 2018, at Rancho Mission Viejo, California.

Guadalupe Moya
Guadalupe Moya (Nov 27, 2018)
Guadalupe Moya