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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

GUADALUPE MOYA, individually, 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

**DECLARATION OF GUADALUPE
MOYA IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class and PAGA
Action Settlement; Declaration of Proposed
Class Counsel (Edwin Aiwazian); and
[Proposed] Order filed concurrently
herewith]

Date: February 15, 2019
Time: 8:30 a.m.
Department: 53
Reservation ID: 181120367673

Complaint Filed: June 30, 2016
Jury Trial: January 9, 2019

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

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

4 Guadalupe Moya
Guadalupe Moya (Nov 27, 2018)

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