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11 Attorneys for Plaintiffs Christiana Sanchez and Tanya Radogna, on behalf of themselves and all
12 others similarly situated

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF SAN DIEGO**

15
16 CHRISTIANA SANCHEZ and TANYA
17 RADOGNA, individually and on behalf of
18 themselves and all others similarly situated,

19 Plaintiffs,

20 vs.

21
22 NATIONSTAR MORTGAGE, LLC, a
23 Delaware Limited Liability Corporation; and
24 DOES 1-50, inclusive,

25
26 Defendants.

Case No. 37 -2022-00037558- CU-OE- CTL

[Assigned for all Purposes to the Hon. Joel Wohlfel, Dept. 73]

**DECLARATION OF TANYA RADOGNA
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

DECLARATION OF TANYA RADOGNA

I, TANYA RADOGNA, declare that:

1. I am a competent adult, I have personal knowledge of the facts set forth in this declaration, and I am making this declaration on behalf of myself, as a named plaintiff, and in support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for Nationstar Mortgage, LLC from approximately May 2020 until the separation of my employment in or about August 2022, as a loan processor. I was subject to all of Defendant's policies and practices that have been alleged as unlawful in the Complaint and First Amended Complaint of *Radogna v Nationstar Mortgage, et al.*; Case No. 22CV016328, filed in the Alameda County Superior Court ("Radogna Action") and the First Amended Complaint of this action, and the notices sent to the Labor and Workforce Development Agency.

3. I have actively participated in the litigation of this case including gathering and locating documents, reviewing them with my attorney, and speaking with other witnesses and class members.. I have given a detailed account of all the facts related to my employment and the claims asserted in the First Amended Complaint. I provided documentation in support of the claims brought against Defendant in support of this class and representative action.

4. My attorneys explained to me the risks and benefits of bringing a representative action. I understood that I took on the risk, both professionally and financially, in pursuing the case as a representative action rather than pursuing my claims individually. I understood that pursuing the case as a representative action meant that it would take substantially longer than pursuing a claim with the California Labor Commissioner and that I risked getting nothing in the end, but I believed it was important to make sure that Defendant followed the law for everyone.

5. I maintained communication with my attorneys throughout the litigation, discussing the facts and policies at issue in the case with my attorney, Reuben D. Nathan. I asked questions when I needed clarification about various aspects of this case to make sure there were continually steps taken to advance the interests of the class. I also understood that the recovery in this case was for the benefit of my fellow coworkers, not just for me. When my attorneys contacted me asking for more information or documents related to the case, I made myself available and tried to give or

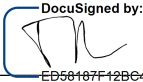
1 obtain any additional information I could. I participated in the negotiations and settlement
2 discussions in this case, speaking with my attorneys to answer questions, providing any additional
3 information needed to assist the negotiations, and discussing the potential terms of the Joint
4 Stipulation of Class Action and PAGA Settlement (“Settlement Agreement”) to evaluate its
5 adequacy.

6 6. I have reviewed the final Settlement Agreement, discussed the terms with my
7 attorneys, and asked my attorneys any questions I had. I believe the settlement terms and allocations
8 are fair and reasonable given the facts of the case.

9 7. I understand that any Class Representative Service Fee that I may receive is for my
10 participation as a Class Representative and it is not contingent on my support or approval of the
11 settlement. I do not believe I have any conflicts with any class members.

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

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16 Executed on 6/9/2025, at San Clemente, California.

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19 Tanya Radogna
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