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

[Additional Counsel on Next Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

CHRISTIANA SANCHEZ and TANYA
RADOGNA, individually and on behalf of
themselves and all others similarly situated,
Plaintiffs,

v.

NATIONSTAR MORTGAGE, LLC, a
Delaware Limited Liability Corporation; and
DOES 1-50, inclusive,
Defendant.

Case No. 37-2022-00037558- CU-0 E- CTL

*[Assigned For All Purposes to the Honorable
Judge Joel Wohlfeil]*

DECLARATION OF CHRISTIANA
SANCHEZ IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT

Date:

Time:

Dept.:

Complaint filed: September 20, 2022

Trial Date: None Set

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6 situated

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NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER
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1 I, Christiana Sanchez, declare as follows:

2 1. I am an individual over the age of 18 and one of the named plaintiffs in this matter.
3 This declaration is submitted in support of approval of the proposed class action settlement
4 ("Settlement") reached in this case. I have personal knowledge of the facts stated in this
5 declaration and could testify competently to them if called upon to do so.

6 2. I was employed by Nationstar Mortgage, LLC. ("Defendant") in California from
7 approximately April 2021 through July 2021. During my employment, I worked as a Loan
8 Officer in a remote capacity, in connection with Defendant's office is located in Santa Ana, CA. .
9 While I worked there, I believe I was not paid for all hours that I worked because, as a result of
10 Defendant's productivity requirements, I was regularly required to work while clocked out on
11 my lunch break and didn't get any pay for that extra work. I also don't think I received all of the
12 meal and rest breaks I was entitled to, I was not reimbursed for all business expenses, and my
13 overtime wages were not consistently paid at the correct rate.

14 3. Because I thought Defendant's practices may not be lawful, I decided to seek legal
15 advice about my work experiences and about filing a lawsuit to obtain relief for my grievances and
16 potentially other employees for the same grievances. I was referred to James Hawkins APLC and
17 spoke with their attorneys. After speaking with the attorneys about my situation and what it meant to
18 bring a class and PAGA action, I decided to proceed with a lawsuit against my former employer. At
19 the time, because I believe other employees were also subject to those same unlawful practices, I
20 also agreed to represent all other similarly situated non-exempt employees who worked for
21 Defendant in California, and to try to obtain relief for the entire class.

22 4. I am aware and have been aware from the inception of the case, that there is the risk
23 that if I do not win my case, then I could be liable for Defendant's litigation costs. I accepted that
24 risk in this case. I also understood that an individual case would potentially have resolved much
25 faster than a class action and involved much less financial risk than a class action.

26 5. I have and continue to be willing to assist in the investigation and prosecution of this
27 matter. I have regularly conferred with my attorneys regarding the case as part of my responsibilities
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1 as a class and PAGA representative. I have searched for and provided any necessary information and
2 documents to my attorneys, including my paystubs, letters and e-mails, policy documents, and other
3 employment documents; reviewed documents and pleadings in this case, including my PAGA letter,
4 the class and PAGA action complaints, the opposition to motion to compel arbitration, the settlement
5 agreement, and this declaration; and communicated with other employees regarding their experiences
6 working at Nationstar Mortgage, LLC. In addition, I will also make myself available for any further
7 proceedings in this matter as required to represent the interests of the Class. I also understand my
8 duties and responsibilities to the proposed Class and will continue carry out those duties.

9 6. I routinely checked in with my attorneys and their staff to make sure that they had all
10 my most current information and any additional information that I had obtained. I made myself
11 available to answer any questions my attorneys had about Defendant's practices and treatment of
12 their employees whenever they needed me, including during mediation. I responded to them as
13 quickly as possible and gave them as much information as I could.

14 7. I reviewed the Settlement Agreement, discussed the Settlement Agreement with my
15 attorneys, and asked them questions before signing it. Based on the information provided, I believe
16 the settlement to be fair, adequate, and reasonable for myself and the entire Class and the Aggrieved
17 Employees.

18 8. I believe that I have done everything that my attorneys have asked of me and tried, to
19 the best of my ability, to seek relief for the Class, the Aggrieved Employees, and the State of
20 California. I have spent numerous hours participating in this matter as described above. I believe my
21 efforts helped get the result obtained in this case.

22 9. I am proud of the result and accomplishment of this lawsuit. I feel that this settlement
23 is a successful outcome and understand that other employees will benefit because of the actions that
24 I, and my co-plaintiffs, have taken.

25 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
26 approval, and any settlement must be designed in the best interest of the Class as a whole. At all
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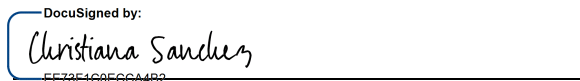
1 times throughout the course of this litigation I have considered the interests of the Class and put them
2 before my own personal interests.

3 11. I understand that, as part of the settlement, I will be asking the Court to approve a
4 service award for me as the Class Representative. I understand that any service award is
5 discretionary and intended to compensate named plaintiffs for the quality and quantity of the work
6 done on behalf of the class and other employees; the financial and/or reputational risk undertaken in
7 bringing the class and/or PAGA action, and an acknowledgment of the benefits resulting from the
8 representative's actions.

9 12. I believe my work in this matter is meritorious on these points for the reasons set forth
10 above. Therefore, I request that the Court preliminarily approve a Class Representative service
11 Award in the amount of \$7,500 for my efforts and active participation in the case and for the broader,
12 general release of all claims that I have or may have against Defendants in connection with the
13 settlement.

14 I declare under penalty of perjury under the laws of the state of California and the United
15 States that the foregoing is true and correct.

16 Executed on 7/7/2025 in Carlsbad, California.

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20 Plaintiff Christiana Sanchez
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