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Attorneys for Plaintiff ALBERTO C. CORTEZ,
on behalf of themselves and others similarly situated

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA**

JULIO ANDRES CRUZ and ALBERTO C.
CORTEZ, an individual, on behalf of themselves
and others similarly situated,

Plaintiffs,

v.

CAMBRIDGE REAL ESTATE SERVICES, INC.
DBA CAMBRIDGE RES, INC., and DOES 1-50,
inclusive,

Defendants.

Case No.: C22-02342

Assigned for all purposes to the
Hon. Benjamin T. Reyes, II, Dept. 16

**DECLARATION OF REPRESENTATIVE
PLAINTIFF ALBERTO C. CORTEZ IN
SUPPORT OF PLAINTIFFS' MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL SETTLEMENT, AWARD OF
ATTORNEYS' FEES, COSTS AND PAGA
REPRESENTATIVE SERVICE AWARD**

Date: August 12, 2026

Time: 9:00am

Dept: 6

D.LAW, INC.

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Attorneys for Plaintiff ALBERTO C. CORTEZ,
on behalf of themselves and others similarly situated

DECLARATION OF ALBERTO C. CORTEZ

I, Alberto C. Cortez, declare:

1. I am an adult over the age of eighteen (18) and I am one of the representative named Plaintiff in the above referenced action. The contents of this declaration are based on my personal knowledge and I would and could competently testify thereto if called to testify. I make this declaration in support of the Motion for Approval of the Private Attorneys General Act Settlement, Award of Attorneys' Fees, Costs and PAGA Representative Service Award.

2. I was employed by Cambridge Real Estate Services, Inc. from around April 2019 through October 2021. I worked as a non-exempt maintenance technician at an apartment complex managed by Defendant in Oroville, California.

3. I am familiar with the work involved in prosecuting the representative action against my former employer Cambridge Real Estate Services, Inc. Since filing my lawsuit about three and a half years ago, I have had many meetings with my attorneys. I am familiar with the claims made in the lawsuit, the mediation proceedings, and settlement discussions, and have participated in all stages of the litigation up to and including preparation for Court approval of the settlement.

4. I believe that during my employment Defendant did not pay me and other non-exempt employees all of our wages. I was scheduled to work 8 hours per day generally asked to perform building and grounds maintenance and property management tasks along with performing repair and construction and common area upkeep tasks at Defendant's various property locations in California.

5. I was routinely required to respond to calls from Defendant after work hours to address maintenance issues or tenant requests and to respond immediately when called. During these on-call hours, I was not permitted to engage in personal activities and had to remain within a 30-minute drive of the property. I was not permitted to record and was not paid for time I was required to be on-call and was only permitted to record the time I spent responding to a call. There were also times I was required to drive to other properties owned and/or managed by Defendant to perform work or retrieve or deliver materials. I was not paid for time spent traveling to other work locations. Moreover, Defendant required me to continue working past the scheduled shift end time to perform various job duties, and expected to

return to work locations when I received calls without compensation.

6. While working for Defendant I was not provided with duty-free meal periods. I was required to record a 1-hour meal period, even though my employer knew I continued to work during that time. Further, if I was on a meal break, I was required to answer calls from Defendant or tenants and to respond so I was never "off-duty." I was not paid by Defendant for time I worked through a meal period and I was not paid an additional hour of pay for any meal period that was cut short, not taken or not taken within the first 5 hours of my shift. Likewise, I was never permitted to take off-duty rest breaks.

7. As a result of not being paid for all time I worked, I believe my pay stubs were inaccurate and I was not paid all wages I was due when my employment with Defendant ended.

8. I was also required by Defendant to use my personal cellphone to communicate with Defendant and personal vehicle to drive to different work locations for which I was not reimbursed.

9. I decided to file a lawsuit against Defendant. I met with my attorneys and considered my options. I decided to bring the lawsuit as a designated representative of the State of California for civil penalties for myself and other non-exempt employees who experienced the same law violations and who were subject to the same policies and practices of Defendant. I also understood that 75% of any civil penalties recovered in the case would be paid to the State and myself and all of the aggrieved employees would receive a portion of 25% of the civil penalties recovered.

10. I spent a significant amount of time searching for documents in my possession, discussing with my attorneys this matter, explaining company policies and practices, reviewing documents, answering questions and assisting with the investigation of the claims. Throughout the case, I have made myself available to my attorneys at their request, stayed in consistent contact with my attorneys regarding the status of the case, discussed the mediation and settlement with my attorneys and participated in many phone calls and meetings. I estimate that I spent over thirty-five (35) hours actively participating in the lawsuit.

11. I am seeking a service award of five thousand dollars (\$5,000.00) for my assistance in prosecuting the case for the State and other employees. I took a huge risk by coming forward with this action and I believe the settlement is fair and reasonable. By becoming a PAGA representative I risked potential retaliation and negative job references from Defendant. Also, I am advised that the State keeps

a public database where anyone can look up my name and learn I brought this action. I understood the risks future employers could find out I brought this case and I understood the other risks when I decided to bring this case. I believe the \$5,000.00 is reasonable for a service award. I understand that the Court must approve this award and that it is not guaranteed.

12. I do not have any interests that are in conflict with the other employees who will receive payment from this settlement.

13. I have reviewed with my attorneys the Settlement Agreement we have negotiated with Defendant and I have agreed to its terms as a representative on behalf of the State of California. I agreed to the settlement because I believe it is fair.

14. I did not type this declaration, but I did review it with my attorneys and everything is true and accurate.

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

Dated this 13 day of July 2026, at Oroville, California.

Signed by:

Albert Cortez

Alberto C. Cortez

PROOF OF SERVICE
Code of Civ. Proc. § 1013a, subd. (3)

STATE OF CALIFORNIA, COUNTY OF CONTRA COSTA

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 249 East Ocean Boulevard, Suite 814, Long Beach, California, 90802.

On **July 21, 2026**, I served [X] true copies [] originals of the following document(s):
DECLARATION OF REPRESENTATIVE PLAINTIFF ALBERTO C. CORTEZ IN SUPPORT OF PLAINTIFFS' MOTION FOR APPROVAL OF PRIVATE ATTORNEYS GENERAL SETTLEMENT. I served the document(s) on the person(s) below as follows:

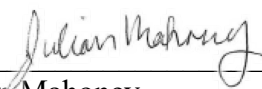
Derek S. Sachs, Esq. Elaine McCormick, Esq. O'HAGAN MEYER LLP One Embarcadero Center, Suite 2100 San Francisco, CA 94111	Attorneys for Defendant CAMBRIDGE REAL ESTATE SERVICES, INC. Telephone: (916) 564-5400 Facsimile: (916) 564-5444 Email: dsachs@ohaganmeyer.com emccormick@ohaganmeyer.com kjanus@ohaganmeyer.com
David Yeremian, Esq. DAVID YEREMIAN & ASSOCIATES, INC. 250 N. Madison Ave. Pasadena, CA 91101	Co-Counsel for Plaintiffs JULIO ANDRES CRUZ and ALBERTO C. CORTEZ Telephone: (818) 962-6465 Facsimile: (818) 962-6469 Email: david@yeremianlaw.com
Emil Davtyan, Esq. Alvin B. Lindsay, Esq. D.LAW, INC. 250 N. Madison Ave. Pasadena, CA 91101	Co-Counsel for Plaintiffs JULIO ANDRES CRUZ and ALBERTO C. CORTEZ Telephone: (818) 962-6465 Facsimile: (818) 962-6469 Email: Emil@d.law a.lindsay@d.law

The document(s) were served by the following means:

☒ **By e-mail:** Based upon court order or an agreement of the parties to accept service by e-mail, I caused the document(s) to be sent to the persons at the electronic service addresses listed above from the email address julian.mahoney@mahoney-law.net. Within a reasonable time after the transmission, no error, electronic message or any other indication that the transmission was unsuccessful was received.

☒ **(State):** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **July 21, 2026**, at Long Beach, California.



Julian Mahoney