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Attorneys for Plaintiff JEANNE
HERNANDEZ, individually, and on behalf
of all others similarly situated and aggrieved

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

JEANNE HERNANDEZ, individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

SKYONE FEDERAL CREDIT UNION; and
DOES 1 through 100, inclusive,

Defendants.

CASE NO.: 25STCV13757

**DECLARATION OF JEANNE
HERNANDEZ IN SUPPORT OF
MOTION TO APPROVE PAGA
SETTLEMENT**

Department: 11
Date: September 8, 2026
Time: 10:00 a.m.

Complaint Filed: May 9, 2025

Trial Date: None set

DECLARATION OF JEANNE HERNANDEZ

I, Jeanne Hernandez, declare as follows:

1. I am a competent adult, I have personal knowledge of the facts in this declaration, and I am making this declaration on behalf of myself, as the named plaintiff, and in support of the Motion to Approve Private Attorneys General Act Settlement.

2. I worked in California as a non-exempt employee of Defendant SkyOne Federal Credit Union (“Defendant”) from approximately February 28, 2023, through October 8, 2024.

3. I retained my attorneys who are experienced in PAGA representative action litigation and class action claims against employers for violations of the California Labor Code. I have no personal relationship or family ties to my attorneys or any officer of the Court. I am not aware of having any actual or potential conflicts of interest with another class member in this case nor am I aware of having any actual or potential conflicts of interest with Phoenix Settlement Administrators, the settlement administrator. I am not involved in the work or governance of Public Citizen Foundation, the proposed *cy pres* recipient in this case, nor on its Board of Directors.

4. I was subject to Defendant’s policies and practices that have been alleged as unlawful in the Complaint and the PAGA notice sent to the Labor and Workforce Development Agency.

5. In bringing this case for myself, the State of California, and the other employees, I understood a lot of work would be required, and I was willing to—and did do—the work to keep the case moving forward. For instance, before the complaint was filed, I spoke to my attorneys several times and discussed how Defendant implemented its company policies and procedures. I also assisted my attorneys in their investigation into my claims by providing them with documents and answering their questions. I reviewed the complaint before it was filed, and, after it was filed, I received and reviewed important documents that were filed to keep up with the developments in the case. My attorneys informed me that Defendant had the right to take my deposition, and that the preparation and deposition itself could take substantial time. Although my deposition was not taken, I feel I would have been adequately prepared and comfortable to give testimony on my experiences.

6. 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 PAGA action.

7. A mediation took place on November 7, 2025, with the Honorable Lisa Hart Cole (Ret.), a well-respected and experienced mediator. The mediation resulted in an agreement to settle the action. I communicated with my attorneys regarding the terms of the settlement that was reached between the parties and understood that the recovery in this case was for the benefit of my fellow coworkers, not just for me, and therefore wanted the best possible result to be obtained for the aggrieved employees. I reviewed and signed the Memorandum of Understanding on November 7, 2025.

8. I have been actively involved with this lawsuit. Although I did not keep time records, I was in regular contact with my attorneys, reviewed court filings, provided information and documents in advance of filing the complaint and in advance of mediation, and spent a significant amount of time on the issues presented during the lawsuit and in the settlement process. I spent dozens of hours working on this case up until this point.

9. I reviewed and signed the final PAGA Settlement Agreement on March 25, 2026, and I believe it is fair and reasonable given the facts of the case.

10. I believe the \$7,500 Service Award I have requested is fair compensation for my efforts in support of this action and the risks I undertook.

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

Executed on 8/6/2026, at Los angeles, California.

DocuSigned by:

 5A57CC73534A423

Jeanne Hernandez