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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

LORENA YEPEZ, individually, and on behalf
 of all others similarly situated,

Plaintiff,

v.

EAST LOS ANGELES REMARKABLE
 CITIZEN'S ASSOCIATION, INC., a
 Nonprofit Corporation; and DOES 1 through
 10, inclusive,

Defendants.

Case No. 22STCV31819

CLASS & REPRESENTATIVE ACTION

[Assigned for all purposes to: Hon. David S.
 Cunningham III, Dept. 6]

**DECLARATION OF PLAINTIFF
 LORENA YEPEZ IN SUPPORT OF
 MOTION FOR FINAL APPROVAL OF
 CLASS ACTION SETTLEMENT**

FINAL APPROVAL HEARING

Date: September 9, 2025
 Time: 10:00 a.m.
 Dept.: 11

Complaint filed: September 29, 2022
 Trial date: Not set

I, Lorena Yepez, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness. I submit this declaration in support of my Motion for Final Approval of Class Action Settlement.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

2. When I decided to become involved in this lawsuit as a class representative on behalf of other employees of Defendant East Los Angeles Remarkable Citizen's Association, Inc. ("Defendant"). I understood that I was not only seeking unpaid wages and penalties on behalf of myself, but also for other employees who worked for Defendant, and that by doing so, I would be delaying more immediate recovery available to me through the Labor Commissioner's office.

3. I was also made aware that being a class representative in an action filed on behalf of others would subject me to a stigma that is sometimes associated with those who bring these kinds of lawsuits. I was aware that, as a class representative, I might be responsible for some or all of Defendant's legal costs if the case was not successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act on behalf of the other employees, but I was nervous about losing and having a judgment filed against me for costs or losing job opportunities in the future.

4. I understood that there were risks involved in class and representative action lawsuits. I understood that the lawsuit could continue for several years and require my services and attention throughout the entire length of the lawsuit. I learned that even if we won at trial, the case could be further delayed by appeals.

Notoriety and Personal Difficulties Encountered

5. As the named plaintiff, I am the face of the litigation. Additionally, the class notice that was mailed in this case was sent to over 149 current and former employees of Defendant. The notice informed all of these employees that I filed a class action against Defendant. Exposing myself to this kind of publicity creates a risk for my future career prospects, since current and former employees of Defendant may move to different companies within the service industry or may know people at other companies within the service industry who may not want to hire someone who sued her employer.

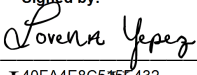
Amount of Time and Effort Spent and Duration of the Litigation

6. I have spent a substantial amount of time and effort on this litigation. My work on this case has included, among other things, gathering and providing my payroll records, discussing potential witnesses, reviewing discovery information and data, and participating in settlement discussions. After mediation, I remained actively involved by reviewing the settlement papers and regularly contacted my counsel for updates. I estimate that since I retained my counsel in June 2022, I have spent approximately 30 hours on the activities described above.

Personal Benefit Received as a Result of the Litigation

7. Absent the requested service payment, the personal benefit I will receive is the same as all other employees. But unlike the other employees, I have signed a general release of Defendant. The other employees are only releasing the wage and hour claims asserted in the lawsuit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 8/15/2025, at Montebello, California.

Signed by:

 Lorena Yepez