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Attorneys for Plaintiff Kelly Acosta
and the Settlement Class

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

Kelly Acosta, individually and on behalf of all
similarly situated individuals,

Plaintiff,

vs.

Cityfront Terrace Homeowners Association,
a California Corporation; and **Does 1-10**,
inclusive;

Defendants.

CASE NO. 25CU033699C

[Assigned for all purposes to the Hon. Mark T.
Cumba Dept. C-65]

CLASS ACTION

**DECLARATION OF KELLY ACOSTA IN
SUPPORT OF MOTION FOR:**

**(1) PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT;**

**(2) APPROVAL OF NOTICE TO CLASS
MEMBERS AND RELATED
MATERIALS; AND**

**(3) SETTING HEARING FOR FINAL
APPROVAL OF SETTLEMENT**

Date: March 26, 2027

Time: 8:30 a.m.

Dept.: C-65

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1 calls meetings with Class Counsel to discuss litigation and settlement strategy; participating in mediation
2 preparation; reviewing the settlement documents, and preparing this Declaration, among others. I agreed
3 to participate in this case with no guarantee of personal benefit.

4 9. This case also involved risks to me personally, such as the potential risk of having to pay
5 costs if we lost and the risk of negative publicity by or to anyone who opposed this case. This litigation
6 was also lengthy. I have been involved in this case—seeking to obtain a benefit for the Class—for almost
7 one (1) year all with no assurance that I would recover any personal benefit.

8 10. Outside of the requested incentive award and my share of the class recovery, I have
9 received no personal benefit for my work and I am not receiving any consideration for my participation
10 in this Settlement other than my requested service award and pro rata share of the Settlement.

11 11. Even in the face of these risks, I pursued this case on behalf of the Class because I
12 believe in it, and we reached a successful resolution and settlement.

13 12. I was happy to learn that the case settled on behalf of the Settlement Members for the
14 amount of \$195,000.00. I believe this is a very positive result, and glad that my efforts helped other
15 employees to benefit and obtain vindication for the Labor Code violations they suffered.

16 13. I understand that class representatives are eligible for compensation for their efforts as
17 a named plaintiff in an action. I respectfully request that the Court preliminarily grant an award to me
18 in the amount of \$10,000, in addition to my pro rata share of the Settlement fund.

19 14. Based on the strong result obtained for the Class, I, along with my counsel, believe this
20 is a fair and appropriate award. I am prepared, and will provide, a detailed accounting of my hours spent
21 assisting in the litigation as part of the Motion for Final Approval.

22 15. I respectfully ask that the Court grant final approval of this Settlement and grant my
23 request for a service award.

24 16. I am not currently, nor have I ever been, a Named Plaintiff in any other PAGA
25 Representative case, pending or closed.

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

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4 Executed on 04/29/26 in the county of San Diego, California.

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6 By: 
7 Kelly Acosta (Apr 29, 2026 08:43:15 PDT)
8 Kelly Acosta
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