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Attorneys for Plaintiff,

MARIA BAHNA and the putative Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN BERNARDINO

MARIA BAHNA, an individual, on behalf
of herself, on behalf of all persons similarly
situated, and on behalf of all aggrieved
employees,

Plaintiff,

vs.

DIOCESE OF SAN BERNARDINO
EDUCATION AND WELFARE
CORPORATION, a California corporation;
and DOES 1 through 50 inclusive

Defendants.

Case No. CIVSB2303381

Hon. David E. Driscoll, Dept. S22

CLASS ACTION

**DECLARATION OF MARIA BAHNA IN
SUPPORT OF PLAINTIFF'S MOTION
FOR ATTORNEYS' FEES, COSTS, AND
EXPENSES, AND CLASS
REPRESENTATIVE ENHANCEMENT
PAYMENT**

Date: October 13, 2026

Time: 8:30 a.m.

Dept.: S22

DECLARATION OF MARIA BAHNA

I, Maria Bahna, declare as follows:

1. I am over the age of eighteen (18). I am a resident of San Bernardino County, State of California. I am familiar with the facts stated herein, and if called upon to testify, I could and would competently testify to facts hereinafter set forth.

2. I am the named Plaintiff in the action entitled *Maria Bahna, et al. v. Diocese of San Bernardino Education and Welfare Corporation., et al.* – Los Angeles Superior Court Case No. CIVSB2303381 (the “Lawsuit”). I submit this declaration in support of Plaintiff’s Motion for Final Approval of Class Action and PAGA Settlement and Plaintiff’s Motion for Attorneys’ Fees, Costs, and Expenses, and Representative Enhancement Payment.

3. I was employed by Defendant DIOCESE OF SAN BERNARDINO EDUCATION AND WELFARE CORPORATION (“Defendant”) from on or about September, 1997 through on or about September 1, 2023, as a Preschool Director at St. Margaret Mary School. My job duties included, among other duties, opening and closing preschools while greeting and sending off students, registering new students, conducting new parent walk throughs of preschools, lesson planning, teaching, and the performance of other clerical duties for Defendant.

4. I have alleged that Defendant failed to properly pay me overtime wages, failed to provide me with compliant meal periods, failed to provide me with compliant rest periods, failed to provide me with accurate itemized wage statements and maintain accurate payroll records, and failed to reimburse me for business expenses incurred in the course and scope of my employment.

5. In approximately July of 2022, I contacted The Ozzello Practice, PC and The Law Offices of David R. Greifinger (“Plaintiff’s Counsel”) regarding my allegations that Defendant failed to properly pay me overtime wages, failed to provide me with compliant meal periods, failed to provide me with compliant rest periods, failed to provide me with

1 accurate itemized wage statements and maintain accurate payroll records, and failed to
2 reimburse me for business expenses incurred in the course and scope of my employment.

3 6. I have always understood that, as a representative of the Class, I have an
4 obligation to act at all times in the best interests of the members of the Class. In that regard,
5 I have not been promised any compensation for acting as a representative of the Class other
6 than any recovery obtained for the benefit of each of the Class members. When I retained
7 Plaintiff's Counsel in this matter, the duties of a class representative were fully explained
8 to me.

9 7. I vigorously pursued all claims that have been asserted in the Lawsuit on
10 behalf of all of the hourly paid employees of Defendants. I have actively, and extensively
11 participated in this litigation, as detailed below.

12 8. Over the course of the past four years, I communicated with Plaintiff's
13 Counsel countless times, sometimes multiple times per day. I made myself available for
14 telephone conferences, emails, and messages with Plaintiff's Counsel at all stages of the
15 litigation, including preliminary investigation, discovery and litigation, mediation, and
16 settlement. I provided Plaintiff's Counsel with detailed summaries of my experiences
17 working for Defendant, and the circumstances that gave rise to the alleged Labor Code
18 violations. I shared my intimate knowledge of Defendant's employment policies and
19 practices, and how these policies and practices were implemented on a daily basis with
20 Plaintiffs' Counsel.

21 9. I collected and shared documents pertaining to my employment with
22 Defendant that assisted in Plaintiffs' Counsel's investigation of the matter. I also reviewed
23 and discussed documents and information provided by Defendants in discovery with
24 Plaintiffs' Counsel.

25 10. I spent time contacting current and former employees of Defendant in
26 furthering the investigation of the matter. I worked diligently to find other putative class
27 members who had the same injuries as myself.
28

11. I meaningfully participated in settlement negotiations of this matter. In addition to the Released Claims for Class Members contained in the January 16, 2026, Stipulation of Settlement (“Settlement Agreement”), I agreed to a much broader general release of claims as against Defendant.

12. I have spent in excess of 100 hours in matters related to the Lawsuit, and I have always placed the interests of the Class ahead of myself. As my name is listed on the case, the Class Notice, and on the internet, the community has and will continue to associate me with this litigation. I fear that I have suffered reputational damage as a result of my service as a Class Representative. Therefore, I request that an incentive award in the amount of Fifteen Thousand (\$15,000.00) be awarded to me for the aid and assistance that I have provided to the Class. I have no interest in and will receive no part of any legal fees awarded by virtue of the settlement in this case.

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

Executed on 09/14/2026, at San Bernardino County, California.

Maria Bahna
Maria Bahna (Sep 14, 2026 13:41:33 PDT)

MARIA BAHNA

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