

Brian J. Mankin, Esq. [CSB No. 216228]
brian@lmlfirm.com
Misty M. Lauby, Esq. [CSB No. 243009]
misty@lmlfirm.com
LAUBY, MANKIN & LAUBY, LLP
5198 Arlington Avenue, PMB 513
Riverside, CA 92504
Tel: (951) 320-1444 | Fax: (951) 320-1445

Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

SAMUEL JOHNSON, individually, on a
representative basis, and on behalf of all
others similarly situated; and JAZMIN
VALERIO individually, on a representative
basis, and on behalf of all others similarly
situated;

Plaintiffs,

vs.

THE J.G WENTWORTH COMPANY, a
California Corporation; SETTLEMENT
FUNDING LLC, a California Corporation;
and DOES 1 through 20, inclusive;

Defendants.

Case No.: 37-2022-00048277-CU-OE-CTL
[Assigned to Hon. Katherine Bacal, Dept C-
69, for all purposes]

**DECLARATION OF JAZMIN VALERIO
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing

Date: August 16, 2024

Time: 1:30 p.m.

Dept.: C-69

Complaint filed: 12/1/2022

I, Jazmin Valerio, state and declare:

1. I am a Plaintiff in the above captioned action and have personal knowledge of all
matters stated herein and could competently testify thereto.

2. I make this declaration in support of the motion for final approval of the class
action settlement reached in this matter. As discussed herein, I believe that the settlement is fair
and reasonable and constitutes a fair resolution of the claims alleged.

1 3. I was employed by The J.G. Wentworth Company/Settlement Funding LLC (“J.G.
2 Wentworth”) from approximately October 2021 to February 2023. During my employment for
3 J.G. Wentworth, there were several issues that concerned me and which I thought did not comply
4 with California law, such as not being paid properly and not getting proper meal periods and rest
5 breaks. As a result, I retained Lauby, Mankin & Lauby LLP to move forward with a case because
6 I did not think that myself or the other employees were being treated correctly.

7 4. After retaining my attorneys, I understood that I had two options: I could pursue
8 my individual case – including claims for discrimination and wrongful termination (as discussed
9 below) – and attempt to maximize my personal recovery, or I could bring a class/representative
10 action and put the interests of the class ahead of my own. The decision of whether to bring my
11 individual claims or to bring a class action put me in a tough spot, because on the one hand, I
12 wanted to hold the company accountable for how they treated me and, on the other hand, I
13 wanted to help other employees that were not paid correctly. And I knew that, if I wanted to
14 bring a class action, I would need to put the interests of the class first to better serve the class. In
15 the end, in the interest of helping all employees that were subjected to the wage violations, I
16 decided to help everyone by bringing a class/representative action.

17 5. Since first initiating this action, I estimate that I have spent at least forty (40) hours
18 engaged in activities to benefit the class. I have assisted my attorneys in numerous ways, including
19 helping to explain and discuss the company’s practices and their general practices and procedures,
20 locating and analyzing company documents, and communicating with other class members. These
21 efforts occurred through numerous meetings with Class Counsel, telephone conferences, letters,
22 emails, and text communications. I also assisted in preparation for mediation and helped obtain a
23 positive result for the class.

24 6. I also believe that the requested service award is fair and reasonable given that I
25 have faced substantial risks and made numerous sacrifices to obtain this class action settlement.

26 7. For example, filing this lawsuit and being a whistleblower was stressful on a day-
27 to-day basis as I have constantly worried about the risk that this could impact my ability to find
28 future jobs. I was worried that filing the case may get me labeled as a whistleblower, resulting in

1 retaliation and difficulty finding work for the rest of my career.

2 8. Additionally, as a condition of this settlement, I was required to compromise on
3 and waive my separate individual claims for harassment, retaliation, and wrongful termination.

4 9. I believe that request for the \$7,500 service award is justified based on (a) the time
5 I have spent on the case, which resulted in a good settlement for the class, (b) the risks I took in
6 bringing this case, which I believe were (unfortunately) realized as my ability to find work has
7 been impacted, and (c) my agreement to waive all of my individual claims for harassment,
8 retaliation, and wrongful termination in exchange for the requested service award.

9 10. I respectfully request that the Court approve this class action settlement. I agreed
10 to set aside my personal interests, and to put the interests of the class ahead or on par with my
11 own. In doing so, and by successfully bringing this case as a class action, I helped to obtain a
12 highly beneficial settlement for the class members.

13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct. Executed on July 25, 2024, at Anaheim, California.

15
16 By:


Jazmin Valerio (Jul 25, 2024 11:28 PDT)
Jazmin Valerio