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and Proposed Class Counsel  
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9  
10 **FOR THE COUNTY OF KINGS**

11 EVA LOPEZ, on behalf of herself and all  
12 “aggrieved employees” pursuant to Labor  
Code § 2698 *et seq.*,

13 Plaintiff,

14 v.

15 QUALITY BUILT, LLC, a Delaware  
16 limited liability company, and DOES 1  
through 10, inclusive,

17 Defendants.  
18  
19

CASE NO: 23CU0207

*Assigned to the Hon. Valerie Chrissakis, Dept. 8*

CLASS ACTION

**DECLARATION OF EVA LOPEZ IN  
SUPPORT OF UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT**

**Date: July 8, 2024**

**Time: 8:15 a.m.**

**Dept.: 8**

*Complaint Filed: June 5, 2023*

1 I, EVA LOPEZ, hereby declare and state as follows:

2 1. I am the named Plaintiff in this lawsuit against Defendant Quality Built, LLC  
3 (“Defendant”) and I submit this declaration in support of Plaintiff’s Unopposed Motion for  
4 Preliminary Approval of Class and Representative Action Settlement. I am a competent adult and  
5 worked for Defendant as a non-exempt employee in Kings County during the relevant time period.  
6 I have personal knowledge of the facts set forth herein, and if called as a witness to testify to them,  
7 I could and would do so competently.

8 2. I contacted my current attorneys when I questioned the employment practices of  
9 Defendant prior to commencing this lawsuit. I accepted the opportunity to act as a Class  
10 Representative in a class action on behalf of other employees of Defendant whom I believed were  
11 being subjected to labor law violations. Although presented with the opportunity, I did not pursue  
12 this case on an individual basis and instead did so as a class action so that I could help other  
13 employees recover for what I believed were Defendant’s illegal practices.

14 3. Specifically, I questioned Defendant’s practices of failing to pay all wages; failing  
15 to provide all meal and rest periods; failing to timely compensate employees upon separation;  
16 failing to reimburse expenses; and issuing their employees deficient wage statements. Through  
17 many discussions with my lawyers, I learned these may be illegal practices and Defendant’s  
18 employees might have recourse for them.

19 4. By bringing this lawsuit, and throughout its course, I have put the interests of the  
20 class ahead of my own. I understood that I could possibly earn a small enhancement payment if  
21 this case resolved itself favorably, but always knew that I could also be responsible for paying  
22 Defendant’s attorneys’ fees and costs if it did not. My goal in bringing this lawsuit was to obtain  
23 a recovery on behalf of the class, and even more importantly, to put an end to what I believed were  
24 illegal practices on the part of Defendant. I believe I have achieved both through this lawsuit and  
25 settlement.  
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27  
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5. I am very happy about the results of this litigation. I am satisfied that Defendant is compensating class members for unpaid wages, premium wages for missed meal and rest periods, unreimbursed expenses, penalties, and interest that I believe we are due.

6. At the onset of this case, I spent time through numerous phone calls with several of my attorneys explaining what I understood to be the policies and procedures of Defendant and how they were applied to me and others I worked with. During the course of this litigation, up through and following the settlement process, I kept actively involved with its status, tracking the status of the case and participating as much as possible.

7. While I have not maintained detailed time records of my activities in connection with this litigation, I believe that have spent and will spend a total of approximately 20 hours assisting my attorneys with the preparation of this case, and doing work and analysis independent from my attorneys both before and during this case, including conducting an independent investigation of the facts.

8. Before this litigation commenced, and throughout its course, I have spent approximately 10 or more hours gathering, organizing, and reviewing documents and information for this lawsuit. I sifted through many of my own documents and reviewed information produced by Defendant as part of this case.

9. I have communicated with my attorneys several times per month to track my case's status. I have taken an active involvement in this matter throughout its course.

10. This lawsuit will almost certainly result in reputational harm to me. There is a stigma associated with suing anyone, let alone your former employer. I will probably be adversely affected when it comes to obtaining future employment – employers who learn that I sued Defendant in a class action will likely avoid hiring me.

11. I do not believe that I have any conflicts with other members of the class. My interests in bringing this lawsuit – for Defendant to change its labor practices going forward and to compensate current and former employees – are the same as those of all other class members.

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

3 Executed on May <sup>05 / 22 / 2024</sup>  , 2024 at Hanford, California.

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5   
6 EVA LOPEZ