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Attorneys for Plaintiff Eva Lopez
and Proposed Class Counsel

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KINGS

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

Plaintiff,

v.

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

Defendants.

CASE NO: 23CU0207

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

CLASS ACTION

**DECLARATION OF EVA LOPEZ IN
SUPPORT OF UNOPPOSED MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND
UNOPPOSED APPLICATION FOR
APPROVAL OF ATTORNEYS’ FEES
AND COSTS, CLAIMS
ADMINISTRATION FEES, AND CLASS
REPRESENTATIVE’S SERVICE
PAYMENT**

Date: October 30, 2024

Time: 8:15 a.m.

Dept.: 8

Complaint Filed: June 5, 2023

DECLARATION OF EVA LOPEZ IN SUPPORT OF UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND UNOPPOSED APPLICATION FOR APPROVAL OF ATTORNEYS’ FEES AND COSTS,
CLAIMS ADMINISTRATION FEES, AND CLASS REPRESENTATIVE’S SERVICE PAYMENT

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

2 1. I am the named Plaintiff in this lawsuit against Defendant Quality Built,
3 LLC (“Defendant”) and I submit this declaration in support of Plaintiff’s unopposed
4 motion for final approval of class action settlement and unopposed application for
5 approval of attorneys’ fees and costs, claims administration fees, and class
6 representative’s service payment. I am a competent adult and worked for Defendant as a
7 non-exempt employee in Kings County during the relevant time period. I have personal
8 knowledge of the facts set forth herein, and if called as a witness to testify to them, I
9 could and would do so competently.

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

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

22 4. By bringing this lawsuit, and throughout its course, I have put the interests
23 of the class ahead of my own. I understood that I could possibly earn a small
24 enhancement payment if this case resolved itself favorably, but always knew that I could
25 also be responsible for paying Defendant’s attorneys’ fees and costs if it did not. My
26 goal in bringing this lawsuit was to obtain a recovery on behalf of the class, and even
27
28

1 more importantly, to put an end to what I believed were illegal practices on the part of
2 Defendant. I believe I have achieved both through this lawsuit and settlement.

3 5. I am very happy about the results of this litigation. I am satisfied that
4 Defendant is compensating class members for unpaid wages, premium wages for missed
5 meal and rest periods, unreimbursed expenses, penalties, and interest that I believe we
6 are due.

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

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

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

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

24 10. This lawsuit will almost certainly result in reputational harm to me. There
25 is a stigma associated with suing anyone, let alone your former employer. I will
26 probably be adversely affected when it comes to obtaining future employment –
27 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.

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

Executed on September 09 / 25 / 2024, 2024 at Hanford, California.

EVA LOPEZ