

Brian J. Mankin, Esq. [CSB No. 216228]
brian@lmlfirm.com
Kristina Bui Carlson, Esq. [CSB No. 294924]
kristina@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
FOR THE COUNTY OF SAN BERNARDINO

VIRGINIA ALVARADO, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

ALTA RESOURCES CORP., a Wisconsin
Corporation; and DOES 1 through 20,
inclusive;

Defendants.

Case No.: CIVSB2304861
*[Assigned to Hon. Joseph Ortiz, Dept S17, for
all purposes]*

**DECLARATION OF PLAINTIFF
VIRGINIA ALVARADO**

I, Virginia Alvarado, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of all matters stated herein and could competently testify thereto. I make this declaration in support of the motion for preliminary approval of the class action settlement. I believe that the settlement is fair and reasonable and constitutes a fair resolution of the claims alleged.

2. When I first retained my attorneys (Lauby, Mankin & Lauby) and chose to pursue this case on a class action basis, I understood that I had specific burdens as the "Class Representative," which included: (a) representing the interests of all class members, (2) considering the interests of all class members above my own personal interests, (3) participating

1 actively in the lawsuit, including potential testimony at deposition and trial, and keeping
2 generally aware of the status and progress of the lawsuit. Moreover, I understood that any
3 resolution of the lawsuit is subject to court approval and must be designed in the best interests of
4 the class as a whole.

5 3. Since first initiating this action on behalf of the proposed class, I believe that I
6 have more than adequately performed my duties as a class representative. I have been an active
7 participant in this litigation, including assisting my attorneys in various ways and making myself
8 available when needed. For example, I have assisted my attorneys by compiling and analyzing
9 substantial documentation regarding the claims in this case. I have also helped to explain and
10 discuss the company's practices and their general practices and procedures, locating and
11 analyzing company documents, among others. I have also reviewed all settlement documents and
12 believe that this settlement is fair for the class. Finally, I will continue to take all steps necessary
13 to finalize this settlement and obtain court approval.

14 4. Additionally, I believe that my claims are typical of the other employees (the
15 Class Members) because we were all subjected to the same uniform practices of the company in
16 regard to payment of wages, calculation of the regular rate of pay and overtime, meal and rest
17 breaks, wage statements, along with other issues. For example, I earned a base hourly rate of
18 pay plus additional nondiscretionary compensation during her employment, just as the other
19 Class Members did. Also, at the start of every shift, I was required to go through various
20 computer "boot up" tasks before being allowed to clock in that I was not paid for that time – just
21 like the other Class Members.

22 5. I have no conflicts with the proposed class members and will continue to assist
23 with the litigation and prosecute the case on behalf of the other employees.

24 6. I respectfully request that the court preliminarily approve the service award. As
25 outlined above, I have performed substantial services for the Class and helped obtain a highly
26 beneficial settlement for my fellow employees. And I have also agreed, as part of this Class
27 action settlement and in connection with the release payment for my individual claims, to waive
28 all of my claims against the company as part of this settlement and in exchange for the service

1 award and the release payment– which goes well beyond the release given by other class
2 members. I am settling all my claims against the company, including those for my alleged
3 wrongful termination and pregnancy discrimination. I alleged that my employment with the
4 company ended right after I wanted to continue with baby bonding time after the birth of my
5 child. Also, I had a hard time with going to doctor’s appointments before the birth of my baby.
6 At the final approval stage, I will submit an additional declaration setting forth all the work I did
7 for this case, including an estimated number of hours spent assisting the Class and my attorneys.

8 I declare under penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct. Executed on Dec 18, 2024, at La Habra, California.

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11 By: 
12 Virginia Alvarado (Dec 18, 2024 11:25 PST)
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