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*Counsel for Plaintiffs and the
Proposed FLSA Collective and Class*

SUPERIOR COURT OF STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

SHEILA LOPEZ, GEORGINA BAUTISTA,
and FE ADRIANO, Individually, and on
behalf of Plaintiffs and the Proposed FLSA
Collective and Class,

Plaintiffs,

v.

WILLISTON FINANCIAL GROUP, LLC, a
Delaware Limited Liability Company; WFG
NATIONAL TITLE INSURANCE
COMPANY, a Florida Corporation; MY
HOME, A WILLISTON FINANCIAL
GROUP COMPANY, LLC, a Delaware
Limited Liability Company; WFG
NATIONAL TITLE COMPANY, a
California Corporation; WFG NATIONAL
TITLE COMPANY OF WASHINGTON, a

Case No.: 24CU015835C

**DECLARATION OF SHEILA LOPEZ IN
SUPPORT OF PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES AND COSTS,
AND ENHANCEMENT PAYMENT**

Hearing: May 2, 2025
Time: 10:15 a.m.
Dept: C-66
Judge: Hon. Wendy M. Behan

Complaint Filed: October 8, 2024
Trial Date: Not Yet Set

business entity unknown; WFG NATIONAL
TITLE COMPANY OF TEXAS, LLC, a
business entity unknown; WFG LENDER
SERVICES, LLC, a business entity unknown;
and DOES 1-10, inclusive,

Defendants.

1 I, Sheila Lopez, declare upon personal knowledge that the foregoing is true and correct:

2 1. I am a party in the above-entitled action. I have personal knowledge of the
3 matters set forth herein, and if called as a witness, I could and would competently so testify. I
4 make this declaration in support of Plaintiffs' Motion for Attorneys' Fees and Enhancement
5 Payment.

6 2. I was employed by Defendants in this matter, as an Administrative and Executive
7 Assistant, and also as an Escrow Processor, in California, from 2013 through the current date.

8 3. I have spent significant time working on this case since approximately April of
9 2023, when I first spoke with Sullivan & Yaeckel Law Group, APC regarding my potential
10 claims against Defendants.

11 4. My work has included: telephone consultations with my attorneys; extensively
12 searching my electronic and paper records to gather documents relevant to the case; providing
13 detailed responses to my attorneys' inquiries regarding Defendant's policies and practices;
14 reviewing and commenting on the draft complaint in the case; helping my attorneys prepare for
15 the settlement negotiations; communicating frequently with my attorneys during the process of
16 negotiating the settlement in this case; reviewing and evaluating the settlement agreement; and
17 speaking with my attorneys to obtain regular updates on the case.

18 5. When I decided to become a lead plaintiff in this case, I understood that I would
19 likely have to have my deposition taken and to respond to written discovery requests. I also
20 understood that the preparation for the deposition and the deposition itself would likely require
21 me to take one to two days off work. Although it would have been difficult for me to take one
22 to two days off work, I was willing to take on this responsibility.

23 6. According to my best estimate, I have spent approximately 25 hours working on
24 this case.

25 7. Participating in this case involved taking on great risk of damaging my future
26 employment prospects, particularly since I am the lead plaintiff. Serving as the lead plaintiff has
27 increased the possibility that my current employer, or a prospective employer in the future,
28

1 might discover that I have participated in this case and retaliate against me.

2 8. To date, I have not received any personal benefit from my participation in this
3 case, but I chose to serve as the lead named plaintiff because I believe strongly that it is
4 necessary to stand up for other employees besides myself.

5
6 I declare under penalty of perjury under the laws of the State of California that the
7 foregoing is true and correct. Executed on the 8th Day of April, 2025.

8 
9 _____
10 Sheila Lopez