

Larry W. Lee (State Bar No. 228175)
 Max W. Gavron (State Bar No. 291697)
 Kwanporn “Mai” Tulyathan (State Bar No. 316704)
DIVERSITY LAW GROUP, P.C.
 515 S. Figueroa Street, Suite 1250
 Los Angeles, CA 90071
 (213) 488-6555
 (213) 488-6554 facsimile
 lwlee@diversitylaw.com
 mgavron@diversitylaw.com
 ktulyathan@diversitylaw.com

William L. Marder (State Bar No. 170131)
 bill@polarislawgroup.com
Polaris Law Group
 501 San Benito Street, Suite 200
 Hollister, CA 95023
 (831) 531-4214
 (831) 634-0333 facsimile

Attorneys for Plaintiffs and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF SANTA CLARA**

SINDE TORRES and CRISTINA
 GUERRERO, as individuals and on behalf
 of all others similarly situated,

Plaintiffs,

vs.

FIDELITY NATIONAL MANAGEMENT
 SERVICES, LLC, a Delaware limited
 liability company; and DOES 1 through 50,
 inclusive,

Defendants.

Case No.: 23CV416377

[Assigned to the Hon. Charles F. Adams,
 Department 7]

**DECLARATION OF CRISTINA
 GUERRERO IN SUPPORT OF
 PLAINTIFFS’ MOTION FOR FINAL
 APPROVAL OF CLASS ACTION
 SETTLEMENT**

Date: September 4, 2025

Time: 1:30 P.M.

Dept.: 7

Action Filed: May 23, 2023

Trial Date: Not Set

DECLARATION OF CRISTINA GUERRERO

I, Cristina Guerrero, declare as follows:

1. I am an individual over the age of 18 years old and am a resident of California. I am a named Plaintiff in this matter. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I have been employed by Defendant Fidelity National Management Services, LLC ("Defendant") as a Junior Escrow Officer since about September 2022, at Defendant's office located in California. I worked as an hourly, non-exempt employee.

3. As part of my employment contract with Defendant, I was guaranteed an agreed upon wage. Before my contract expired, however, Defendant unilaterally decreased the amount paid to me.

4. In addition, during my employment I regularly earned non-discretionary pay, such as signing bonuses. During workweeks when I earned non-discretionary pay and overtime, Defendant did not pay overtime wages based on the regular rate of pay. As a result, I was not paid all overtime wages owed. To date, I have yet to receive all underpaid wages.

5. In addition, as a result of the underpayment of wages, the wage statements issued to me did not identify the correct hourly rates of pay, total hours worked, and gross and net wages earned.

6. During the pendency of this lawsuit, I was required to provide assistance to my attorneys, including meeting with them and providing them with documents and information. I have spent a significant amount of time meeting and/or conferring with my attorneys in connection with the assistance/prosecution of the class claims. I estimate that I spent approximately 35 hours in connection with the assistance/prosecution of the class claims in this lawsuit. This includes having numerous telephonic discussions and meetings with my attorneys regarding the case, searching for and providing various documents relating to my claims, reviewing and preparing my declarations in this case, and reviewing various files and pleadings in this case, including the settlement agreement in this case. Throughout this case, I have continuously been kept apprised of the status of this case.

7. I understand that this action was brought on behalf of all other employees in the State of California, and that I am acting as a representative for the Settlement Class. As a Class Representative, I understand that it is my responsibility to act in the best interests of Settlement Class Members and I have done so. Moreover, I am not aware of any conflicts that exist between my interests and the interests of the Settlement Class that would impair or affect my ability to serve as representative for the Settlement Class.

8. I have and continue to be willing to assist in the investigation of this matter, including meeting, conferring, and discussing the case with my attorneys, providing any necessary information and documents, and making myself available for trial or any further proceedings in this matter as required to represent the interests of Settlement Class Members. I also understand my duties and responsibilities to the Settlement Class and will carry out those duties as necessary.

9. I have discussed the terms of the Joint Stipulation of Class Action and PAGA Settlement (“Settlement Agreement”) with my attorneys, and based on the information provided, I believe the settlement to be fair, adequate, and reasonable for myself and for the Settlement Class.

10. I understand that I could have been liable for Defendant's legal costs had Defendant prevailed. I also understand that this lawsuit was filed in the public court records.

11. I am proud of the results achieved in this case and the compensation that will be provided to the employees of Defendant because of the actions I have taken. I support this settlement.

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

Executed on this ¹³ day of August 2025, at San Jose, California.

DocuSigned by:
Cristina Guerrero
265461D1-2B9C-43B

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

(Code of Civil Procedure Sections 1013a, 2015.5)

STATE OF CALIFORNIA]
]ss.
COUNTY OF LOS ANGELES]

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 515 S. Figueroa Street, Suite 1250, Los Angeles, California 90071.

On August 13, 2025, I served the following document(s) described as: **DECLARATION OF CRISTINA GUERRERO IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT** on the interested parties in this action as follows:

Angela J. Rafoth
Emily Mertes
Littler Mendelson, PC
101 Second Street, Suite 1000
San Francisco, California 94105

*Attorneys for Defendant Fidelity National
Management Services, LLC*

ARafoth@littler.com
EMertes@littler.com

 X BY ELECTRONIC SERVICE: Based on a court order I caused the above-entitled document(s) to be served through the Odyssey eFileCA E-Filing System at the website www.california.tylerhost.net, addressed to all parties appearing on the electronic service list for the above-entitled case. The service transmission was reported as complete and a copy of the filing receipt/confirmation will be filed, deposited, or maintained with the original document(s) in this office.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on August 13, 2025, at Los Angeles, California.



Erika Mejia