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LIZ ADRIANA MARTINEZ CHAVEZ, and all other similarly situated persons

[Additional Counsel on Next Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN BERNARDINO

SYNTHIA CASTILLO GARCIA, on
behalf of herself and all others similarly
situated,

Plaintiff,

v.

KALAVERAS RC INC, a California
corporation, and DOES 1-20, inclusive,

Defendants.

Case No. CIVSB2315395

Assigned for All Purposes to:
The Hon. Kevin C. Lee
Dept.: S-26

**SUPPLEMENTAL DECLARATION OF SAM
KIM IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: April 24, 2026
Time: 8:30 a.m.

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DECLARATION OF SAM KIM

I, SAM KIM, declare as follows:

1. I am an attorney at law licensed to practice before this Court. I am a partner at Verum Law Group, APC, counsel of record for plaintiffs Synthia Castillo Garcia and Liz Adriana Martinez Chavez (collectively, "Plaintiffs"), in this matter. I have personal knowledge of all of the facts set forth herein. If called as a witness, I could and would competently testify thereto.

2. I submit this supplemental declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

3. I am not aware of any class, representative or other collective action in any other court in this or any other jurisdiction that asserts claims similar to those asserted in this action on behalf of a class or group of individuals who would also be members of the class defined in this action.

4. Through March 30, 2026, Verum Law Group, APC ("VLG"), has spent approximately 121.9 hours on this action and incurred approximately \$121,900.00 in fees. The fees incurred were reasonable and necessary to prosecute this case. The billing rates for partners at VLG, Sam Kim ("SK") and Yoonis Han ("YH") are \$1,000.00 per hour. Attached hereto is a summary of the lodestar for VLG in this action.

Name	Position	Hours	Rate	Total
Sam Kim	Partner - 17 years	78.4	\$1,000	\$78,400.00
Yoonis Han	Partner - 17 years	43.5	\$1,000	\$43,500.00
TOTAL HOURS		121.9	TOTAL FEES	\$121,900.00

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

Executed on March 30, 2026, at San Gabriel, California.

/s/ Sam Kim
Sam Kim