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Attorneys for Plaintiffs Virginia Brew, Tony Grosbeier, Courtney Tolbert, D C Snyder, and Timothy Mellen

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN MATEO

VIRGINA BREW, TONY GROSBEIER,
COURTNEY TOLBERT, D C SNYDER,
AND TIMOTHY MELLEN on behalf of
themselves and all similarly situated persons,
and the general public,

Plaintiffs,

vs.

ROCKET MORTGAGE, LLC.; and DOES 1
through 25, inclusive,

Defendants.

CASE NO. 24-CIV-00893

*[Assigned for all purposes to the
Honorable Nancy L. Fineman, Dept. 4]*

**DECLARATION OF VIRGINA BREW IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT; CLASS
REPRESENTATIVE ENHANCEMENT
AWARDS; SETTLEMENT
ADMINISTRATOR'S EXPENSES;
ATTORNEYS' FEES AND COSTS; AND
JUDGMENT THEREON**

Hearing Date: February 4, 2025

Time: 2:00 p.m.

Dept: 4

DECLARATION OF VIRGINA BREW

I, VIRGINA BREW, declare that:

1. I am a competent adult, over the age of eighteen (18) and am a plaintiff and class representative in the above-entitled action. I have personal knowledge of the facts stated herein except as to those matters stated upon information or belief, and, as to those matters, I believe them to be true. If called as a witness, I could and would testify truthfully and competently to the matters stated herein. Capitalized terms used but not defined in this declaration have the same definition as used in the accompanying Motion for Final Approval and Application for Attorneys' Fees and Costs.

2. I was employed by Rocket Mortgage LLC from August 29, 2022 to October 23, 2023.

3. In or around November 29, 2023, I also retained attorneys Matthew Righetti and John Glugoski of Righetti Glugoski, P.C. and Reuben D. Nathan of Nathan & Associates, APC to represent my interests in the Action.

4. On February 15, 2024, I filed a PAGA-only styled action entitled *Brew, et al. v. Rocket Mortgage, et al.* Case No. 24-CIV-00893 in the San Mateo Superior Court.

5. On June 11, 2024, a First Amended Complaint in this action was filed by my attorneys on behalf of myself, Courtney Tolbert, Tony Grosbeier, D C Snyder, and Timothy Mellen. The purpose of the lawsuit is to recover unpaid wages, including minimum wage, overtime, reimbursement of business expenses, pay premiums for meal and rest break violations, unlawfully deducted wages, waiting time penalties, penalties for inaccurate wage statements, and penalties for the labor code violations.

6. Throughout the case, I have been actively involved in pursuing information that could support the case, and ultimately, I believe my efforts helped the Class Members. My efforts included my initial consultation with my attorneys, searching and locating documents, reviewing documents securing participation of additional class members, maintaining regular contact with my attorneys, and reviewing all relevant information and documentation provided to me by my attorneys.

7. As discussed below, I request that the Court award me a Class Representative service Payment of Two Thousand Five Hundred Dollars and Zero Cents (\$2,500.00) and Two Thousand Five Hundred Dollars and Zero Cents (\$2,500.00) in exchange for a general release.

1 8. I believe this amount is justified by my expenditure of time, and the personal risk I
2 assumed. I suffered risks to future employment by filing this case. I understand from my attorneys
3 the the excellent results in this case are unusual compared to most class cases, which I believe also
4 supports my service award.

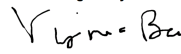
5 9. During my employment with Defendants, I was not provided lawful meal periods and
6 rest breaks or compensation in lieu of, I was not provided itemized accurate wage statements, I was
7 not reimbursed for business expenses, I was not provided the lawful minimum wage and overtime
8 wages owed to me, unlawful deductions were made from my wages, I was not paid all wages owed
9 to me upon my separation of employment, and I am owed penalties under the labor code. The Class
10 Members suffered the same or substantially similar injuries as me.

11 10. From November 29, 2023 to the present date, I have spent approximately 22.5 hours
12 on this case. I signed a retainer agreement and spoke with Matthew Righetti for approximately 2
13 hours regarding the case. I spent approximately 4 hours searching for documents on my computer
14 and emails pertaining to my employment. I spent 8.5 hours attending and participating in the
15 mediation. I received the Confidential Memorandum of Understanding ("MOU") from my attorneys.
16 I spent 1 hour reading over the MOU and consulting with my attorneys and then executed the MOU.
17 I received the long form settlement agreement from my attorneys. I spent 2.5 hours reading over the
18 settlement agreement and consulted with my attorneys and executed the agreement on June 5, 2024.
19 While my attorneys were preparing the Motion for Preliminary Approval, they called me several
20 times to confirm certain information and have me located documents to support the motion which
21 took 2 hours. In addition, I spent an additional 2.5 hours reviewing my files and preparing this
22 declaration.

23 11. Given the time spent bringing and prosecuting the case, I believe an enhancement
24 award of \$2,500.00 is reasonable given the results. I also believe an additional \$2,500.00 (\$5,000.00
25 total) is appropriate since I am agreeing to enter into a general release of any claims I might have
26 against Defendant whether known or unknown at this time.

27 I declare under penalty of perjury under the laws of the State of California and the United
28 States of America that the foregoing is true and correct.

Executed on December 12, 2024, at Irvine, California.

DocuSigned by:

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Virginia Brew