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BRANDON OARE, and HELEN YVONNE FRENCH

[Additional Counsel on Next Page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

DAWN BABBE, individually, and on behalf of
other members of the general public similarly
situated and as an aggrieved employee pursuant to
the Private Attorneys General Act ("PAGA"),

Plaintiff,

vs.

MFI RECOVERY CENTER, a California non-
profit corporation; and DOES 1 through 10,
inclusive,

Defendants.

ALMA BUENO, BRANDON OARE, and HELEN
YVONNE FRENCH, individually, and on behalf
of other members of the general public similarly
situated,

Plaintiffs,

vs.

MFI RECOVERY CENTER, a California
corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No.: CVRI2103146
Consolidated with Case No.: CVRI2200393

Honorable Harold W. Hopp
Department 1

CLASS ACTION

**DECLARATION OF HELEN
YVONNE FRENCH IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: July 13, 2026
Time: 8:30 a.m.
Department: Dept. 1

Babbe Complaint Filed: June 18, 2021
Babbe FAC Filed: October 7, 2021
Bueno Complaint Filed: January 28, 2022
Trial Date: None Set

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Attorneys for Plaintiff DAWN BABBE

DECLARATION OF HELEN YVONNE FRENCH

I, Helen Yvonne French, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned matter. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by MFI Recovery Center ("Defendant") from approximately August 2017 to approximately January 2019 as a non-exempt employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers for Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for not properly compensating its employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers for Justice, PC discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and class representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the matter, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Throughout this matter, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent time speaking with my attorneys about the matter, identifying

1 potential witnesses, providing my attorneys with documents and information concerning the
2 matter, and also describing policies, practices, and procedures of Defendant.

3 5. As far as the settlement is concerned, I was available to review documents and
4 answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the
5 Settlement Agreement and discussed the questions I had regarding the potential settlement with
6 my attorneys before signing the settlement papers.

7 6. I understand that a settlement has been reached in my case and what my duties
8 and responsibilities are as a class. For example, I am aware that if the settlement is granted
9 preliminary approval, the Court will certify a class for settlement purposes, and likely appoint
10 me as the representative of the class and my attorneys as counsel for the class. I also understand
11 that my duties will include checking in on, monitoring, and conferring with my attorneys to
12 facilitate the notice and settlement administration process, and to provide information that the
13 Court needs in order to assess whether the settlement is fair, reasonable, and adequate. Further,
14 if any individuals who are potential class members contact me, I will take steps to have them
15 referred to the Court-appointed settlement administrator so that these individuals may receive
16 the necessary information and notice they may be eligible to receive in connection with the
17 settlement and contemplated final approval hearing.

18 7. I believe that I have done everything that my attorneys have asked of me and have
19 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
20 members. I have volunteered to represent and champion the interests of many other people with
21 similar claims and injuries because of the importance of the matter and the necessity that all
22 class members benefit from the matter equally. I understand that as a proposed class
23 representative, and if formally appointed as a class representative, I have and continue to
24 represent the interests of all members of the class in litigation to recover relief for the class. As
25 a non-exempt employee of Defendant who was subject to the same policies, practices, and
26 procedures as the other members of the class, I have claims that are typical of those of the class.
27 I consider the interests of the class just as I would consider my own interests. I understand that
28 I may need to put the interests of the class before my own interests, although I have no reason

1 to believe that my interests are in conflict with the interests of the class. I understand that any
2 resolution of the matter is subject to court approval and must be in the best interest of the class
3 as a whole. I have participated, and continue to participate, in the matter as necessary. I have
4 actively followed and monitored the progress of the matter, and have taken steps to make sure
5 that the litigation is prosecuted by the skilled and effective attorneys that I have retained.

6 8. I think my efforts helped to get the result obtained in this matter, and as a potential
7 class representative, I respectfully request that the Court award me a class representative
8 enhancement award for my efforts in pursuing and participating in this matter, as well as my
9 broader release of claims. Taking into consideration the time that I have dedicated to this matter,
10 I believe this amount is reasonable.

11 9. I am not related to anyone associated with Lawyers *for* Justice, PC.

12 10. I have not entered into any undisclosed agreements, nor have I received any
13 undisclosed compensation in this matter. The only compensation I will receive is whatever
14 amount the Court awards as a class representative enhancement award, as well as any individual
15 settlement payment.

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

18 04/09/2026

19 Executed on this ____ day of April 2026, at Rialto, California.

20 Electronically Signed 2026-04-09 16:11:52 UTC - 199.66.14.129
Helen Yvonne French
Nintex AssureSign® c9b14e3a-d037-420e-b29e-b4270129b9f1

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