

Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Yasmin Hosseini (SBN 326399)
Selena Matavosian (SBN 348044)
Erica Stepanian (SBN 362054)
LAWYERS for JUSTICE, PC
450 N. Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs ALMA BUENO,
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 DAWN BABBE 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

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

Andrew E. Hillier (SBN 295779)
Francis A. DiGiacco (SBN 265625)
HILLIER DIGIACCO LLP
600 West Broadway, Suite 700
San Diego, California 92101
Tel: (619) 330-5120 / Fax: (619) 839-3895

Attorneys for Plaintiff DAWN BABBE

DECLARATION OF DAWN BABBE

I, Dawn Babbe, declare and state as follows:

1. I am over the age of 18 and have personal knowledge of the facts set forth in this declaration and could and would testify competently to them.

2. I was employed by Defendant in an hourly, non-exempt position from May 18, 2020 to October 14, 2020.

3. I am a Named Plaintiff and prospective Class Representative in the above-referenced action. I first spoke to my attorney, Keia J. Atkinson of Finkelstein & Krinsk LLP, prior to filing the Complaint on May 25, 2021, to discuss my potential claims. During this call we discussed at length the details of my employment duties, such as preparing and manufacturing packaging materials for Defendant's customers and clients. During this call Mr. Atkinson and I discussed the potential for my wage and hour class action and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it means to be a named plaintiff, class representative, and PAGA representative.

4. Following this call with Mr. Atkinson, I had several additional conversations with my attorneys relating to my claims. I gathered and sent to my attorneys documents related to my employment with Defendant. I took the time to carefully review a representation agreement that included a description of the obligations I was agreeing to take on in representing the class.

5. Mr. Atkinson's office sent me a draft of the Complaint, which I reviewed in detail. I then provided feedback on the Complaint.

6. In total, throughout the process of the Complaint being filed, I spent approximately 6 hours working with my attorneys to prepare the case for filing, reviewing my obligations as class representative, and informing myself about the process.

7. The process of searching through my employment documents and providing them to Mr. Atkinson was time-consuming. I estimate that I spent approximately 6 hours in total from when I first reached out to Mr. Atkinson to right after the Complaint was filed collecting documents and discussing them with Mr. Atkinson and his office.

1 8. As the case continued, Andrew E. Hillier and Francis A. DiGiacco of Hillier
2 DiGiacco LLP became the lead attorneys. I corresponded with Mr. DiGiacco and his office
3 regarding the factual support for my claims, the documents and evidence in support thereof, and
4 case updates.

5 9. As my attorneys began preparing the mediation brief in this case, they reached out
6 to me with questions, which I answered promptly. I reviewed a copy of the mediation brief. On
7 the day of mediation, I was present on the remote mediation call and available to assist with
8 anything Mr. DiGiacco needed for the mediation and settlement efforts.

9 10. In the weeks that followed, I communicated with Mr. DiGiacco about the
10 preparation of a formal settlement agreement. I then reviewed the formal agreement, discussed
11 it with Mr. DiGiacco, and signed it. In total, I estimate that I spent 14 hours on mediation
12 preparation, mediation, and settlement agreement review.

13 11. After the settlement was reached, I communicated with my attorneys about the
14 state of the preliminary approval motion and issuance of class notice. I also talked with my
15 attorneys in detail about the contents of this declaration, and I reviewed and commented on it to
16 ensure its accuracy.

17 12. I estimate that I have spent approximately 30 hours serving as a Class
18 Representative on this case. This does not include any additional time I may spend on the case
19 depending on the Court's ruling on this Motion, the subsequent filing of the Motion for Final
20 Class Action Settlement Approval, and any issues that require my involvement in the eventual
21 distribution of settlement funds.

22 13. Throughout the litigation, I promptly responded to my attorneys' calls and emails
23 for information or input about the case. I believe that I have done everything my attorneys asked
24 of me and have tried, to the best of my ability, to represent the class. I think my efforts helped
25 to get the result obtained in this matter, and as a class representative, I respectfully request that
26 the Court award me a Class Representative Service Award in the amount of \$10,000.00 for my
27 active participation in the litigation. Taking into consideration the time that I have dedicated to
28 the matter and the value added, I believe this amount is reasonable.

15. Serving as a Class Representative has caused some apprehension for me. I worry that being a Named Plaintiff in this action will adversely impact my career. This worry, however, is superseded by my desire to help obtain justice for the others I worked with who were also harmed.

17. I am not related to anyone associated with Hillier DiGiacco LLP, Lawyers for Justice, P.C., Finkelstein & Krinsk LLP, or Lawyers for Employee and Consumer Rights.

18. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as a Class Representative Service Award, as well as my share of the settlement fund as a class member

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on April 9, 2026 in Fontana, California.

Dawn Babbe