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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF ORANGE

DEE DEVER, individually, on a  
representative basis, and on behalf of all  
others similarly situated;

Plaintiff,

vs.

RESCUE 1 FINANCIAL, LLC., a California  
Limited Liability Company; and DOES 1  
through 20, inclusive;

Defendants.

Case No.: 30-2023-01360010-CU-OE-CXC  
*[Assigned to Hon. Melissa McCormick, Dept  
CX104, for all purposes]*

**DECLARATION OF PLAINTIFF DEE  
DEVER**

I, Dee Dever, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of all matters stated herein and could competently testify thereto. I make this declaration in support of the motion for preliminary approval of the class action settlement. I believe that the settlement is fair and reasonable and constitutes a fair resolution of the claims alleged.

2. When I first retained my attorneys (Lauby, Mankin & Lauby) and chose to pursue this case on a class action basis, I understood that I had specific burdens as the "Class Representative," which included: (a) representing the interests of all class members, (2) considering the interests of all class members above my own personal interests, (3) participating

1 actively in the lawsuit, including potential testimony at deposition and trial, and keeping  
2 generally aware of the status and progress of the lawsuit. Moreover, I understood that any  
3 resolution of the lawsuit is subject to court approval and must be designed in the best interests of  
4 the class as a whole.

5 3. Since first initiating this action on behalf of the proposed class, I believe that I  
6 have more than adequately performed my duties as a class representative. I have been an active  
7 participant in this litigation, including assisting my attorneys in various ways and making myself  
8 available when needed. For example, I have assisted my attorneys by compiling and analyzing  
9 substantial documentation regarding the claims in this case. I have also helped to explain and  
10 discuss the company's practices and their general practices and procedures, locating and  
11 analyzing company documents, among others. I have also reviewed all settlement documents and  
12 believe that this settlement is fair for the class. Finally, I will continue to take all steps necessary  
13 to finalize this settlement and obtain court approval.

14 4. Additionally, my claims are typical of the other employees (the class members)  
15 because we were all subjected to the same uniform practices of the company in regard to  
16 payment of wages, calculation of the regular rate of pay and overtime, meal and rest breaks,  
17 wage statements, along with other issues.

18 5. I have no conflicts with the proposed class members and will continue to assist  
19 with the litigation and prosecute the case on behalf of the other employees.

20 6. I respectfully request that the court preliminarily approve the service award. As  
21 outlined above, I have performed substantial services for the Class and I also undertook  
22 significant risks and stresses at a high emotional cost without any guarantee of success. For  
23 example, filing this lawsuit and being a whistle blower was stressful on a day-to-day basis as I  
24 have constantly worried about the risk that this case could impact my ability to find future jobs.  
25 And this stress/risk lasted for the entire case, and I'm still worried it may make it hard to find a  
26 job in the future. Additionally, via my decision to bring this as a class action, and my active  
27 participation in the same, I helped obtain a highly beneficial settlement for my fellow employees.  
28 At the final approval stage, I will submit an additional declaration setting forth all the work I did

1 for this case, including an estimated number of hours spent assisting the Class and my attorneys.

2 I declare under penalty of perjury under the laws of the State of California that the  
3 foregoing is true and correct. Executed on May 30, 2025, at Garden Grove, California.

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5 By:   
6 Dee Dever (May 30, 2025 15:14 PDT)  
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