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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 final 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. During my employment with Rescue 1, there were several issues that concerned me and which I thought did not comply with California law, such as not being paid properly and not getting proper meal periods and rest breaks. Even though I was unsure if I wanted to bring a lawsuit because of the risk of stepping forward as a whistle blower (since this could jeopardize

1 my livelihood in the industry and make it difficult to find future jobs), I retained Lauby, Mankin
2 & Lauby LLP to proceed with this class action because I did not think that myself or the other
3 employees were being treated correctly.

4 3. When I first retained my attorneys (Lauby, Mankin & Lauby) and chose to pursue
5 this case on a class action basis, I understood that I had specific burdens as the “Class
6 Representative,” which included: (a) representing the interests of all class members, (2)
7 considering the interests of all class members above my own personal interests, (3) participating
8 actively in the lawsuit, including potential testimony at deposition and trial, and keeping
9 generally aware of the status and progress of the lawsuit. Moreover, I understood that any
10 resolution of the lawsuit is subject to court approval and must be designed in the best interests of
11 the class as a whole.

12 4. I respectfully request that the court approve the service award for the following
13 reasons.

14 5. First, I spent substantial time working on this case, and estimate I have spent at
15 least sixty (60) hours engaged in activities to benefit the class and to help obtain a highly
16 beneficial settlement for my fellow employees. Moreover, I have assisted my attorneys in
17 numerous ways, including helping to explain and discuss the company’s practices and their
18 general practices and procedures, locating and analyzing company documents, communicating
19 with other class members. These efforts occurred through numerous meetings with Class
20 Counsel, telephone conferences, letters, emails, and text communications. I also spent substantial
21 time assisting with preparation for mediation, where we obtained an extremely good result for
22 the Class. My work also continued after mediation, as I reviewed settlement agreements and
23 other settlement documents, and continued communication with Class Counsel and other class
24 members during the settlement approval processes.

25 6. Second, I respectfully request that the Court approve the agreed-upon service
26 award because I agreed to set aside my personal interests and to put the interests of the class
27 ahead or on par with my own. In doing so, and by successfully bringing this case as a class
28 action, I helped to obtain a highly beneficial settlement for the class members.

7. Third, by bringing this case as a class action, I undertook significant risks and stresses at a high emotional cost without any guarantee of success. For example, filing this lawsuit and being a whistle blower was stressful on a day-to-day basis as I have constantly worried about the risk that this case could impact my ability to find future jobs. This stress/risk lasted for the entire case, and I'm worried it may make it hard to find a job in the future since the case information is all available online.

8. Fourth, bringing this case also came with a major financial risk because, if I lost the case, I would be required to pay the company's costs, which could be over \$10,000, and there was a chance they could try to make me pay their attorneys' fees as well.

9. Based on information provided by the settlement administrator, I anticipate receiving a proportionate share of the PAGA allocation in the amount of \$20.10 and a proportionate share of the Class allocation in the amount of \$513.62 (which, when added together, result in a total anticipated payment of \$533.71).

10. Therefore, I respectfully request that the Court award the full requested service award since that amount is justified based on the facts above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on **Feb 18, 2026**, at Garden Grove, California.

By:

Dee Dever (Feb 18, 2026 12:00:04 PST)