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Attorneys for Plaintiff NORA MONTENEGRO, individually, and on behalf of other members of the general public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

NORA MONTENEGRO, individually, and
on behalf of other members of the general
public similarly situated

Plaintiff

v.

CONSTELLIS INTEGRATED RISK
MANAGEMENT SERVICES, INC., a
Delaware Corporation; CENTERRA
GROUP, LLC, a Delaware Limited Liability
Company; CENTERRA SERVICES
INTERNATIONAL, INC., a Delaware
Corporation; and DOES 1-10, inclusive

Defendants

CASE NO. 37-2024-00011032-CU-OE-CTL

**DECLARATION OF NORA
MONTENEGRO IN SUPPORT OF
PLAINTIFF'S UNOPPOSED MOTION FOR
FINAL APPROVAL OF (1) CLASS
ACTION SETTLEMENT; (2)
ATTORNEYS' FEES AND COSTS; and (3)
CLASS REPRESENTATIVE AWARDS**

Date: January 9, 2026

Time: 10:30 a.m.

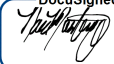
Judge: Hon. Carolyn M. Caietti

Dept.: C-70

1 I, Nora Montenegro, hereby declare as follows:

- 2 1. I am the named Plaintiff in the above-captioned matter. I make this declaration in support of
3 Plaintiff's Unopposed Motion for Final Approval of Class Action Settlement.
- 4 2. I have personal knowledge of the facts set forth in this declaration and if called to testify as a
5 witness, I could and would do so.
- 6 3. To my recollection, I personally met with my Attorneys on at least 9 occasions. Several of those
7 meetings lasted in excess of one hour.
- 8 4. During these meetings, I would review and explain numerous documents turned over by
9 Defendants from my employment. I would also explain my (as well as others') role during
10 work. I also helped identify numerous other employees who could support the claims I was
11 making in this lawsuit.
- 12 5. I also spoke with my attorneys on the phone on at least 15 other occasions.
- 13 6. In total, I estimate that I spent at least 55 hours related to the above mentioned tasks directly
14 working with my attorneys. I also estimate I spent at least another 5 hours of my own time
15 gathering evidence and outlining issues that I later shared with my attorneys.
- 16 7. When I decided to move forward with this case, I was counseled by my attorneys of the
17 potential stigma of being a Representative in a "Wage and Hour," dispute, as this is a publicly
18 filed lawsuit.
- 19 8. I was also advised when I brought this case that had we lost, I could have been personally liable
20 for paying all of Defendants' costs. I was further advised this could be well into the tens of
21 thousands of dollars on this type of case.
- 22 9. Despite these risks I was committed to achieving a settlement that would benefit all employees
23 working for Constellis Integrated Risk Management Services, Inc.; Centerra Group, LLC;
24 and/or Centerra Services International, Inc.

25 I declare under penalty of perjury under the laws of the State of California that the foregoing is
26 true and correct. Executed this 16th day of December, 2025.

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NORA MONTENEGRO