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Attorneys for Plaintiffs Virginia Brew, Tony Grosbeier, Courtney Tolbert, D C Snyder, and Timothy Mellen

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN MATEO

VIRGINIA BREW, TONY GROSBEIER,
COURTNEY TOLBERT, D C SNYDER,
AND TIMOTHY MELLEN on behalf of
themselves and all similarly situated persons,
and the general public,

Plaintiffs,

vs.

ROCKET MORTGAGE, LLC.; and DOES 1
through 25, inclusive,

Defendants.

CASE NO. 24-CIV-00893

*[Assigned for all purposes to the
Honorable Nancy L. Fineman, Dept. 4]*

**DECLARATION OF TONY GROSBEIER IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT; CLASS
REPRESENTATIVE ENHANCEMENT
AWARDS; SETTLEMENT
ADMINISTRATOR'S EXPENSES;
ATTORNEYS' FEES AND COSTS; AND
JUDGMENT THEREON**

Hearing Date: February 4, 2025

Time: 2:00 p.m.

Dept: 4

DECLARATION OF TONY GROSBEIER

I, TONY GROSBEIER, declare that:

1. I am a competent adult, over the age of eighteen (18) and am a plaintiff and class representative in the above-entitled action. I have personal knowledge of the facts stated herein except as to those matters stated upon information or belief, and, as to those matters, I believe them to be true. If called as a witness, I could and would testify truthfully and competently to the matters stated herein. Capitalized terms used but not defined in this declaration have the same definition as used in the accompanying Motion for Final Approval and Application for Attorneys' Fees and Costs.

2. I was employed by Rocket Mortgage LLC from July 30, 2021 to November 15, 2022.

3. In or around November 29, 2023, I also retained attorneys Matthew Righetti and John Glugoski of Righetti Glugoski, P.C. and Reuben D. Nathan of Nathan & Associates, APC to represent my interests in the Action.

4. On February 15, 2024, I filed a PAGA-only styled action entitled *Brew, et al. v. Rocket Mortgage, et al.* Case No. 24-CIV-00893 in the San Mateo Superior Court.

5. On June 11, 2024, a First Amended Complaint in this action was filed by my attorneys on behalf of myself, Courtney Tolbert, Virginia Brew, Timothy Mellen, and D C Snyder. The purpose of the lawsuit is to recover unpaid wages, including minimum wage, overtime, reimbursement of business expenses, pay premiums for meal and rest break violations, unlawfully deducted wages, waiting time penalties, penalties for inaccurate wage statements, and penalties for the labor code violations.

6. Throughout the case, I have been actively involved in pursuing information that could support the case, and ultimately, I believe my efforts helped the Class Members. My efforts included my initial consultation with my attorneys, searching and locating documents, reviewing documents securing participation of additional class members, maintaining regular contact with my attorneys, and reviewing all relevant information and documentation provided to me by my attorneys.

7. As discussed below, I request that the Court award me a Class Representative service Payment of Two Thousand Five Hundred Dollars and Zero Cents (\$2,500.00) and Two Thousand Five Hundred Dollars and Zero Cents (\$2,500.00) in exchange for a general release.

11 10. From November 29, 2023 to the present date, I have spent approximately 25 hours
12 assisting with this case. My time spent on this case includes speaking with counsel regarding the case,
13 searching for documents and providing those to my counsel, attending and participating in the
14 mediation, reading over the MOU and consulting with my attorneys, reading and consulting with my
15 attorneys about the long form settlement agreement, answering their questions throughout the
16 litigation about policies and procedures, reviewing records produced by Rocket, and reviewing my
17 files and preparing this declaration.

22 I declare under penalty of perjury under the laws of the State of California and the United
23 States of America that the foregoing is true and correct.

Signed by: 
27E0981CFE2140C...
Tony Grosbeier