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

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN MATEO**

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

Plaintiff,

v.

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 REUBEN D.
NATHAN IN SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Date: September 24, 2024

Time: 2:00 p.m.

Dept: 4

DECLARATION OF REUBEN D. NATHAN

I, REUBEN D. NATHAN, declare that:

1. I make this declaration of my personal knowledge and could testify thereto if called as a witness and I possess the experience and personal knowledge necessary to make the statements herein.

2. I am the principal attorney at the law firm of Nathan & Associates, APC ("RN"). I am co-counsel of record for Plaintiffs VIRGINA BREW, TONY GROSBEIER, COURTNEY TOLBERT, DC SNYDER, AND TIMOTHY MELLEN ("Plaintiffs") in this class action against ROCKET MORTGAGE, LLC ("Defendant"). I am an attorney at law licensed to practice in the State of California and the District of Columbia, and I am a member of the bar of this Court. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, I could and would testify competently thereto. I make this declaration in support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action and PAGA Settlement.

3. I graduated from Western State University School of Law in 1999 after pursuing undergraduate studies in the United Kingdom. I am admitted to practice law before all courts in the State of California.

4. I have been practicing law full time for approximately 25 years. My practice has been devoted to complex class action and/or representative action litigation. Much of this litigation has involved class action and representative action prosecution of wage and hour laws (state and federal), state and federal privacy laws (FCRA, CCPA and CCCRA) and consumer laws.

5. I have been named a Super Lawyer from 2014-2022 and won awards such as Class Action Attorney of the Year. I have represented and continue to represent plaintiffs in various types of class action cases.

6. I have served as lead class counsel in several cases and as counsel in PAGA representative actions, including some of the following, which are set forth below:

a. *Reid v. Diedrich Coffee, Inc., et al.*, U.S. District Court, Central District of California, Case No. SACV06-888 AG (MLGx);

b. *Scerca v. Town & Country, et al.*, U.S. District Court, Central District of California, Case No. SACV06-889 AG (MLGx);

- c. *Hilliard v. Ameriquest, et al. and Torok v. Ameriquest, et al.*, U.S. District Court Central District of California, Case No. SACV06-892 JVS (ANx);
- d. *Strich v. Solstice Capital, et al.*, U.S. District Court Central District of California, Case No. CV05-8757 SGL (RNBx);
- e. *The Parking Concepts Wage & Hour Cases*, Los Angeles County Superior Court, Case No. JCCP 4531;
- f. *Griffin et al. v 725 Baker LLC, Orange County County Superior Court*, Case No. 30-2010-00397655-CU-OE-CXC;
- g. *Leon v. Allied Exhaust Systems*, Los Angeles Superior Court, Case No.: BC438653;
- h. *De Los Santos v. Lala's Argentine Grill*, Los Angeles Superior Court, Case No. BC472215;
- i. *Duarte v. Heroes Restaurants, Inc.*, Orange County Superior Court, Case No.: 30-2012-00581304;
- j. *Lopez v. My World Enterprises, Inc.*, Los Angeles Superior Court, Case No. BC506687;
- k. *Taylor v. Loandepot.com, llc.*, Orange County Superior Court, Case No. 30-2013-00648925;
- l. *Soto v. Wild Planet, Inc.*, Northern District of California, Case No. 5:15-cv-05082, resulting in a settlement on behalf of class members;
- m. *Tran v. Paramount Mortgage, LLC*, Orange County Superior Court, Case No. 30-00827323 resulting in a settlement on behalf of class members;
- n. *Morris v. SolarCity Corporation*, Northern District of California, Case No. 5:15-cv-005107, resulting in a \$15,000,000.00 settlement on behalf of class members;

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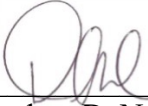
- 1 o. *Santoli v. The Money Source, Inc., et al.*, Orange County Superior Court, Case
2 No. 30-2017-00917450 resulting in a \$1,500,000.00 settlement on behalf of class
3 members;
- 4 p. *Lavelle v. Nationstar Mortgage, et al.*, Orange County Superior Court, Case No.
5 30-2017-00917438 resulting in a \$10,050,000.00 settlement on behalf of class
6 members;
- 7 q. *Arnold v. Guaranteed Rate Inc., et al.*, Ventura County Superior Court, Case No.
8 56-2019-00523081-CU-OE-VT;
- 9 r. *Sicairos v. Staffmark Investment, LLC, et al.*, Orange County Superior Court,
10 Case No. 30-2019-01050988, PAGA only action, resulting in a \$1,500,000
11 settlement on behalf of aggrieved employees, resulting in \$350 per pay period
12 and approximately \$2,000 per aggrieved employee;
- 13 s. *Louka v. Nations Direct Mortgage, et al.*, Orange County Superior Court, Case
14 No. 30-2019-01042277-CU-OE-CXC;
- 15 t. *Arevalos v. Americor Funding, Inc., et al.*, Orange County Superior Court, Case
16 No. 30-2019-01068606-CU-OE-CX;
- 17 u. *Nelson v. Bridgestone Retail Operations, LLC, et al.* San Diego Superior Court,
18 Case No. 37-2020-00035994-CU-OE-CTL, coordinated with *Bridgestone Retail*
19 *Wage and Hour Cases*, JCCP Action, San Bernardino Superior Court, Case No.
20 JCCP 5054, consolidated with *Strawn v. Bridgestone Retail Operations, LLC, et*
21 *al.*, Sacramento Superior Court, Case No. 34-2018-00242049;
- 22 v. *Jones v. Apple, Inc., et al.*, Merced County Superior Court, Case No. 18CV-0455;
23 PAGA only action; and
- 24 w. *Sandoval v. Home Depot U.S.A., Inc.*, Alameda County Superior Court, Case No.
25 22CV015414, PAGA only action.

26 7. My firm is co-counsel with Righetti Glugoski, P.C. I have worked with Matthew Righetti
27 and John Glugoski for more than 12 years and we have been approved as class counsel in several actions.
28 Some examples of the work I performed in connection with this case are set forth in paragraphs 21 and

1 22 of the Declaration of John Glugoski.

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

4 Executed on June 28, 2024, at Newport Beach, California.

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7 Reuben D. Nathan