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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 D C SNYDER 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

1 **DECLARATION OF D C SNYDER**

2 I, D C SNYDER, declare that:

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

9 2. I was employed by Rocket Mortgage LLC from in or around January 2020 to April
10 11, 2022.

11 3. In or around December 2021 I retained Crosner Legal, P.C. to represent sent me in an
12 action against Rocket MortgageLLC.

13 4. On June 21, 2022, my attorneys Crosner Legal, P.C. filed the Complaint in D C Snyder
14 v. Rocket Mortgage, LLC, et al. Los Angeles Superior Court Case No. 22STCV20293 ("Snyder
15 Action").

16 5. In or around March 2024, I also retained attorneys Matthew Righetti and John
17 Glugoski of Righetti Glugoski, P.C. and Reuben D. Nathan of Nathan & Associates, APC to represent
18 my interests in the Action.

19 6. On June 11, 2024, I joined this action, through the filing of the First Amended
20 Complaint in this action, filed by my attorneys on behalf of myself, Virginia Brew, Tony Grosbeier,
21 Courtney Tolbert, and Timothy Mellen. The purpose of the lawsuit is to recover unpaid wages,
22 including minimum wage, overtime, reimbursement of business expenses, pay premiums for meal
23 and rest break violations, unlawfully deducted wages, waiting time penalties, penalties for inaccurate
24 wage statements, and penalties for the labor code violations.

25 7. On June 12, 2024 the Snyder Action was dismissed without prejudice.

26 8. Throughout the case, I have been actively involved in pursuing information that could
27 support the case, and ultimately, I believe my efforts helped the Class Members. My efforts included
28 my initial consultation with my attorneys, searching and locating documents, reviewing documents

1 securing participation of additional class members, maintaining regular contact with my attorneys,
2 and reviewing all relevant information and documentation provided to me by my attorneys.

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

6 10. I believe these amounts are justified by my expenditure of time, and the personal risk
7 I assumed. I suffered risks to future employment by filing this case. I understand from my attorneys
8 the the excellent results in this case are unusual compared to most class cases, which I believe also
9 supports my service award.

10 11. During my employment with Defendants, I was not provided lawful meal periods and
11 rest breaks or compensation in lieu of, I was not provided itemized accurate wage statements, I was
12 not reimbursed for business expenses, I was not provided the lawful minimum wage and overtime
13 wages owed to me, unlawful deductions were made from my wages, I was not paid all wages owed
14 to me upon my separation of employment, and I am owed penalties under the labor code. The Class
15 Members suffered the same or substantially similar injuries as me.

16 12. From December 2021 to the present date, I have spent approximately 6 hours
17 searching for documents on my computer and emails. I located several documents that appeared to
18 fit the description of the documents which continued throughout the litigation. After reading through
19 emails and attachments, I located several separate documents that I provided to my attorneys.

20 13. On or about December 23, 2021, I signed a retainer agreement and spoke with the staff
21 at Crosner Legal PC for approximately 90 minutes regarding the documents I provided.

22 14. In January 2023, attorney Brandon Brouillette was assigned to my case. During the
23 time of early February 2023 through the present date, I spent approximately 5 hours on the phone
24 with Brandon providing him with information he requested to create a discovery plan, prepare
25 litigation strategy for the case, conferring with others, and scheduling times.

26 15. On March 7, 2024, I took the entire day off of work per my attorneys request to be
27 available for the mediation. I made myself available for the full-day mediation and took time off of
28 work for a total of 10 hours.

16. On or about March 25, 2024, I received the Confidential Memorandum of Understanding (“MOU”) from my attorneys. I spent 30 minutes reading over the MOU, an additional 30 minutes consulting with my attorneys, and then executed the MOU on March 26, 2024.

17. On or about June 5, 2024, I received the long form settlement agreement from my attorneys. I spent 2 hours reading over the settlement agreement and consulted with my attorneys and executed the agreement on June 5, 2024.

18. While my attorneys were preparing the Motion for Preliminary Approval, they called me several times to confirm certain information and have me located documents to support the motion which took an hour.

19. I spent an additional 2 hours reviewing my files and preparing this declaration.

20. I estimate that I have spent a total of approximately 30 hours in serving as a class representative in this case as set forth in the details above.

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

Executed on December 12, 2024, at Lancaster, California.

D C SNYDER

D C Snyder

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Document ID	1271eb79c542deb96e5785aad831bfe00017d2e8
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