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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

MARINA CAYON and KRISTINE
REESOR, as individuals and on behalf of
all other aggrieved employees,

Plaintiffs,

vs.

ZIONS BANCORPORATION, NATIONAL
ASSOCIATION, a Utah corporation; and
DOES 1 through 100,

Defendants.

Case No. 30-2024-01396627-CU-OE-CXC

[Assigned to the Hon. David A. Hoffer, Dept.
CX103]

**DECLARATION OF KRISTINE REESOR
IN SUPPORT OF MOTION FOR
APPROVAL OF SETTLEMENT OF
CLAIMS BROUGHT UNDER THE
PRIVATE ATTORNEYS' GENERAL
ACT**

Date: June 22, 2026

Time: 1:30 p.m.

Dept.: CX103

Complaint Filed: April 29, 2024

Trial Date: None set

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I, KRISTINE REESOR, declare as follows:

1. I am an individual over the age of 18 and am one of the named plaintiffs in this matter. This declaration is submitted in support of approval of the Settlement Agreement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I was employed by Defendant Zions Bancorporation, National Association (“Defendant”) as a non-exempt “Mortgage Lender” from 2013 until December 31, 2024. During my employment with Defendant, I was subject to Defendant’s wage and hour policies and practices at issue in this action.

3. During my employment with Defendant, I was told by my managers and supervisors that I was not allowed to record my overtime hours. From 2020 through approximately 2022, I worked considerable overtime hours due to the high volume of mortgage loans I was handling during this time period. Despite working in excess of eight (8) hours on most days during this time period, I was not allowed to record these overtime hours, and I believe I was underpaid my overtime wages as a result. I also often did not always get a meal period until after the fifth hour of work ended and my meal periods were frequently less than a full 30 minutes due to the load of work assigned to me. Also, I was also not provided a second 30 minute meal period for shifts when I worked over 10.0 hours. Similarly, I was not provided all of my off duty rest periods due to high demand of loans I had to process. As a result of these violations, it is my understanding that Defendant did not issue accurate and compliant wage statements.

4. When I filed this lawsuit, I understood that I was filing this case as an "Aggrieved Employee" on behalf of myself and other non-exempt employees of Defendant as well as the State of California. I also understood that this lawsuit could benefit my former coworkers, other employees currently employed by Defendant, and the State of California by helping to recover penalties on their behalf as a result of the alleged violations described above.

5. When I filed this lawsuit, I understood that filing a lawsuit is a public record. I also understood that there was a risk I could be liable for Defendant's costs if we lost the case.

1 However, I accepted those risks so that I could help recover penalties on behalf of Defendant's
2 employees and the State of California. To date, even though I assumed these risks, I have not
3 suffered any actual adverse consequences because I filed this case.

4 6. I have been actively involved in this case since I retained my attorneys in 2023.
5 Without waiving the attorney-client privilege, I have had many phone conversations and meetings
6 with my attorneys throughout this case to discuss Defendant's wage and hour policies and
7 practices, identify potential witnesses, and discuss case strategy. I also gathered and reviewed
8 documents for use in the lawsuit and reviewed relevant documents with my attorneys. I estimate
9 that I have spent approximately 40 hours performing these activities in order to help the case.

10 7. I understand that my attorneys will request that the Court approve a service award
11 of \$10,000.00 for my efforts on behalf of the Aggrieved Employees and the State of California. I
12 believe this amount is reasonable based on the amount of time and effort I have devoted to this
13 case and the risks I have undertaken as a representative. My support for the Settlement is not
14 contingent on me receiving this service award.

15 I declare under penalty of perjury under the laws of the State of California and the United
16 States that the foregoing is true and correct. Executed on March 25, 2026 at
17 Orange, California.

Kristine Reesor
Kristine Reesor (Mar 25, 2026 18:33:09 PDT)

Kristine Reesor