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Attorneys for Plaintiff
YESENIA DIAZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA

YESENIA DIAZ, on behalf of herself, and all
others similarly situated,

Plaintiff,

v.

SOS INTERNATIONAL LLC; and DOES 1
through 50, inclusive,

Defendants.

Case No. 24CV069862

*Assigned for all purposes to the
Hon. Somnath Raj Chatterjee*

CLASS ACTION

**DECLARATION OF YESENIA DIAZ IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT AND MOTION
FOR AWARD OF REASONABLE
ATTORNEYS' FEES AND COSTS, CLASS
REPRESENTATIVE INCENTIVE
AWARD/GENERAL RELEASE PAYMENT,
AND SETTLEMENT ADMINISTRATION
FEES**

Date: February 24, 2026
Time: 2:30 p.m.
Dept: 21

Complaint filed: April 2, 2024
FAC filed: June 25, 2024
Trial Date: TBD

Reservation No. 916074479444
Reservation No. 938887012557

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1 I, YESENIA DIAZ, declare as follows:

2 1. I am the named Plaintiff and Class and PAGA representative in this action against
 3 SOS INTERNATIONAL LLC (“SOSI”). I submit this Declaration in support of the Plaintiff’s
 4 Motion for Final Approval of Class and PAGA Settlement and Motion for Award of Reasonable
 5 Attorneys’ Fees and Costs, Class Representative Incentive Award/General Release Payment, and
 6 Settlement Administration Costs. I am a competent adult, I have personal knowledge of the facts
 7 set forth in this declaration, and I could and would testify competently under oath if called as a
 8 witness.

9 2. I performed interpreting services for Defendant’s clients in immigration court from
 10 approximately 2016 to March 2024 in California. I was classified as an independent contractor.

11 3. I believe that it was wrong for SOSI to classify myself and other immigration court
 12 interpreters as independent contractors rather than employees. I also believe that due to being
 13 misclassified as an independent contractor, I and other immigration court interpreters were not
 14 properly paid all of our wages, including wages for all hours worked and overtime, did not
 15 receive proper meal and rest breaks, as well as were not properly reimbursed for our business
 16 expenses.

17 4. When I decided to bring this action, I first spoke with my attorney Robert Spencer,
 18 Esq. of Keller Grover LLP. We discussed Keller Grover LLP’s extensive experience litigating
 19 employment cases. I spent over an hour and a half describing to him the facts of my case. We
 20 also discussed in-depth the process of class action litigation as well as my responsibilities as a
 21 class representative. We also discussed that the case would be brought as a “PAGA”
 22 representative action under the Labor Code Private Attorneys’ General Act of 2004, Labor Code
 23 §§ 2698, *et seq.*

24 5. I also spent several days searching for documents that would aid my attorneys in
 25 this case. After I found these documents, I had additional telephone calls with Mr. Spencer to
 26 discuss them and how they affect the case.

27 6. Prior to filing the complaint, I spent over an hour with Mr. Spencer working on the
 28 PAGA exhaustion letter that was sent to the State of California. I understand that I was required

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to send this letter to the State of California in order to bring the PAGA causes of action. I also spent approximately 30 minutes with Mr. Spencer reviewing it over the telephone when it was ready, then another 30 minutes reviewing the PAGA letter at home to make sure it was accurate.

7. My attorneys filed the Complaint on April 2, 2024 and I reviewed it with Mr. Spencer. I then spent approximately an hour at home reviewing the complaint prior to it to being filed. My attorneys later filed an amended complaint in this action adding PAGA claims on June 25, 2024. I also discussed this with Mr. Spencer and reviewed it before it was filed.

8. Mr. Spencer let me know that Defendant was willing to mediate this action and we discussed what that meant. The mediation took place on March 18, 2025. Prior to the mediation, I had numerous telephone calls with Mr. Spencer to respond to questions that he had. I also made sure that I was available on the date of the mediation. The mediation was successful.

9. When the formal settlement was ready, I spent half an hour speaking with Mr. Spencer regarding the settlement, whether it was fair, and the plan of distribution. I also spent two hours reviewing the settlement agreement before I signed it. Prior to signing it I also had additional telephone calls with Mr. Spencer to answer questions that I had.

10. Mr. Spencer kept me up to date regarding the motion for preliminary approval of the settlement. Mr. Spencer also let me know that the Court had some concerns in the preliminary approval process and that we had to amend the settlement agreement to address these concerns. The Court was concerned about the scope of the PAGA release as well as the length of the check cashing period. I discussed these changes with Mr. Spencer as well as spent 30 minutes reviewing the amended settlement before I signed it. I also submitted a declaration in support of preliminary approval noting that I did not have a conflict of interest with the proposed cy pres recipient, Legal Aid at Work.

11. Throughout this litigation, I have had regular telephone conversations with Mr. Spencer regarding this case, we speak about once a month. I often telephone Mr. Spencer to see how the case is going and ask whether there is anything that I need to do. I also receive regular telephone calls from Mr. Spencer updating me on the progress of the case. In addition to telephone calls, we also text each other often.

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12. Further, this litigation is very important to me. I even made myself available to answer questions from Mr. Spencer when I was out of the country after my grandmother unfortunately passed. I believe this shows my dedication to this action.

13. When I agreed to act as a named plaintiff/Class Representative, I understood that I might be responsible for some of the costs incurred by Defendant if the lawsuit was unsuccessful. In addition to this, I worried about my reputation in the community if people were to find out I had sued somebody.

14. I also am concerned about the possible repercussions to my future job opportunities because I have been a plaintiff in a class action wage and hour lawsuit against an employer.

15. I understood from the beginning that I was pursuing this case not only for my own benefit, but for the benefit of large numbers of past and present employees who either were not aware of their rights or were too afraid of retaliation to complain.

16. I believe that the settlement reached in this case is fair and, in light of the risks involved, will justly compensate the employees who were and are affected by the violations that were the subject of the action.

17. I believe that my proposed incentive award that I have requested is fair in light of all the work I did in this case against SOSI. I further believe my proposed incentive award is fair considering the work I put into the case, the risks I took, the harm that I believe my suing my employer could cause me in terms of future job prospects, and the benefits that have been achieved for the class members. I have also given a general release of my claims.

18. I understand that as a class and PAGA representative I have to be a champion of the causes of many other people with similar claims as my own. I know that this action is brought on behalf of a group of immigration court interpreters and the group is referred to as a class. I am aware that the proposed class has to be approved by the Court, and I am the representative of the class. I also understand that as a PAGA representative, I am bringing an enforcement action on behalf of California seeking statutory penalties on behalf of myself and other aggrieved employees.

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19. As a proposed class and PAGA representative, I am fully aware that this means that I have responsibilities to the class and the aggrieved employees. I know that I am a fiduciary of the class and the aggrieved employees. This means that I have to look out for the best interest of the class and the aggrieved employees. I have a responsibility to consider the interest of the class and the aggrieved employees just as I would consider my own interest, even if that means that I must put their interests before my own.

20. I know that I have to actively participate in the lawsuit, which I have done. I have worked with my attorneys throughout this lawsuit and am always available to answer their questions. I would have also testified if need be as well as attend trial.

21. I also know that it is my duty to cooperate fully in this action and be forthright with both the attorneys and the Court by being truthful and providing all of the facts, both good and bad, when asked.

22. I am aware that the Court has to approve the settlement in this lawsuit because it is both a proposed class action and a PAGA action. I have reviewed and approved the both the original and amended settlement and I believe that it is fair and will justly compensate the class and the aggrieved employees.

23. I have no interest or involvement with the settlement administrator Phoenix Settlement Administrator.

24. I also have no interest or involvement in the governance or work of the proposed cy pres recipient, Legal Aid at Work.

25. I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct, and that this Declaration was executed on this 1/24/2026 (insert date) at Chino, California.


 YESENIA DIAZ

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PROOF OF SERVICE

I, JOEY GONZALEZ, am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1965 Market Street, San Francisco, California 94103. On **January 30, 2026** in the case of *Diaz v. SOS International LLC*, Alameda County Superior Court Case Number 24CV069862, I served the foregoing document(s):

DECLARATION OF YESENIA DIAZ IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT AND MOTION FOR AWARD OF REASONABLE ATTORNEYS' FEES AND COSTS, CLASS REPRESENTATIVE INCENTIVE AWARD/GENERAL RELEASE PAYMENT, AND SETTLEMENT ADMINISTRATION FEES

on the interested party(ies) below, using the following means:

Ken Sulzer, Esq. ksulzer@constangy.com Regina Musolino, Esq. rmusolino@constangy.com Constangy, Brooks, Smith & Prophete, LLP 2029 Century Park East, Suite 1100 Los Angeles, California 90067	<i>Attorneys for Defendant</i> SOS INTERNATIONAL LLC
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☒	(BY ELECTRONIC SERVICE) by electronically mailing a true and correct copy in PDF format through our electronic mail system to the email address(es) set forth above, or as stated on the attached service list per agreement between the parties.
☒	(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.



 JOEY GONZALEZ