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Attorneys for Plaintiff SHANNA JIMENEZ,
on behalf of herself and all others similarly situated

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

SHANNA JIMENEZ, on behalf of herself
and all others similarly situated,

Plaintiffs,

v.

SOFI LENDING CORP., a California
corporation; and Does 1 to 10, inclusive,

Defendants.

CLASS ACTION

Case No. 24CV02457

**DECLARATION OF VANESSA M.
RUGGLES IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Preliminary Approval Hearing:

Date:

Time:

Dept: 18

Honorable Kenneth G. English
Department 18

Action filed: April 16, 2024

Trial date: None Set

1 **DECLARATION OF VANESSA M. RUGGLES IN SUPPORT OF PLAINTIFF'S**
2 **MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA**
3 **SETTLEMENT**

4 I, Vanessa M. Ruggles, declare:

5 1. I am an attorney in good standing duly admitted to the State Bar of California and
6 an attorney of record for Plaintiff Shanna Jimenez in this action. I have firsthand knowledge of
7 the facts set forth in this declaration and, if called to do so, could testify competently to them.
8 This Declaration is submitted in support of Plaintiff's Motion for Preliminary Approval of Class
9 Action and PAGA Settlement.

10 2. I am admitted to practice law in the state of California. I completed my
11 undergraduate studies at University of Nebraska – Lincoln with a Bachelor of Arts degree in
12 French with minors in Political Science and Sociology in August of 2000. I completed my legal
13 studies at California Western School of Law in San Diego, California, where I received a Juris
14 Doctor degree, magna cum laude, with a concentration in Labor and Employment Law, with
15 honors, in April 2007. I first gained experience in employment law during law school, when I
16 interned at the Employee Rights Center and clerked for over two years at an employment law
17 boutique firm. I also externed for the Hon. Alex C. McDonald at the Court of Appeal, Fourth
18 District, Division One.

19 3. Since being admitted to the California State Bar in December 2007, I have
20 practiced employment law almost exclusively. In the last several years, I have worked mostly in
21 wage and hour litigation. Attorneys across California routinely seek my help with complicated
22 wage claims and complex litigation. I have performed significant behind-the-scenes substantive
23 and strategic work on over one hundred wage and hour class and/or PAGA actions. I have been
24 approved as class counsel in the following class actions: *Hayes v. Avis Rent a Car System LLC*
25 (L.A. Sup. Ct.) 22STCV26153; *Estrada v. Urban Retreat, Inc.* (Shasta Sup. Ct.) 23CV-0201662;
26 *Gardner v. Hilmar Cheese Company, Inc.* (Merced Sup. Ct.) 21CV-03416; *Osuna v. Vintage*
27 *Associates, Inc.* (Riverside Sup. Ct.) CVRI2200103; *Santillan v. Verizon Connect, Inc.* (S.D. Cal.)
28 3:21-cv-1257-H-KSC; *ClubCorp Wage and Hour Cases* (O.C. Sup. Ct.) JCCP 5138; *Alvarez v.*

1 *Bershtel* (L.A. Sup. Ct.) 19STCV01129; *Mier v. Mainfreight, Inc.* (L.A. Sup. Ct.) 19STCV04465;
2 *Santoya v. Fasttrak Foods LLC* (Riverside Sup. Ct.) PSC1707227.

3 4. Each of the cases listed in the above paragraph involve wage and hour issues
4 similar to the legal and factual issues involved in this case.

5 5. The firm representing the Class has a great deal of experience in wage and hour
6 class action litigation and has been approved as class counsel in numerous other wage and hour
7 class actions. Based on the documents and information provided by Defendant, and our own
8 independent investigation and evaluation, Class Counsel and Plaintiff are of the opinion that the
9 Settlement with Defendant for the consideration and on the terms set forth in this Settlement is
10 fair, reasonable, and adequate, and is in the best interest of the Class Members in light of all
11 known facts and circumstances, including the risk of significant delay and uncertainty associated
12 with litigation, various defenses asserted by Defendant, and numerous potential appellate issues.

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

15 Executed on August 18, 2025, at Palm Springs, California.

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VANESSA M. RUGGLES