

John G. Yslas (SBN 187324)
jyslas@wilshirelawfirm.com
William M. Pao (SBN 219846)
william.pao@wilshirelawfirm.com
Refugio Ortega-Carrillo (SBN 346933)
refugio.ortegacarrillo@wilshirelawfirm.com
Emily K. Borman (SBN 303180)
emily.borman@wilshirelawfirm.com
Courtney M. Miller (SBN 327850)
courtney.miller@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
660 S. Figueroa Street, Sky Lobby
Los Angeles, California 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA

GLORIA NASH, individually, and on behalf of
all others similarly situated,

Plaintiff,

v.

1ST NORTHERN CALIFORNIA CREDIT
UNION, a California nonprofit corporation; and
DOES 1 through 10, inclusive,

Defendants.

Case No.: C24-01997

*[Assigned for All Purposes to the Hon.
Edward Weil, Dept. 39]*

**DECLARATION OF GLORIA NASH IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Action Filed: July 30, 2024

DECLARATION OF GLORIA NASH

I, Gloria Nash, hereby declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of my Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for Defendant 1st Northern California Credit Union (“1st Nor Cal Credit Union”) as an hourly-paid non-exempt employee from approximately October 2023 to approximately March 2024. I worked for 1st Nor Cal Credit Union as a customer service representative. My job duties included processing savings and checking accounts, posting loan payments, cashing checks, opening and maintaining account records, and balancing each day’s transactions and verifying cash totals.

3. Based on my experience and knowledge of 1st Nor Cal Credit Union’s wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on behalf of myself as well as other hourly-paid non-exempt employees of 1st Nor Cal Credit Union.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to those of other hourly-paid non-exempt employees of 1st Nor Cal Credit Union. I believe we were all subject to the same employment policies and practices while working for 1st Nor Cal Credit Union.

5. I do not have any conflicts with other hourly-paid non-exempt employees of 1st Nor Cal Credit Union that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid non-exempt employees at 1st Nor Cal Credit Union.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by 1st Nor Cal Credit Union’s company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by 1st Nor Cal Credit Union.

7. I have always kept the best interests of the other hourly-paid non-exempt employees in mind while performing my duties as the named plaintiff in this case. I have been committed throughout the course of this case to vigorously prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the other hourly-paid non-exempt employees by initiating this lawsuit, providing information to my attorneys, keeping in regular contact with my attorneys regarding the status of the case, meeting with my attorneys regarding the claims, and reviewing the settlement agreement to make sure it was fair.

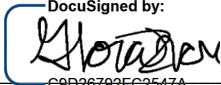
8. I will continue to actively participate in this lawsuit as necessary and will continue to make myself available to assist in this case moving forward as needed.

9. I do not have any actual or potential conflicts of interest with Class Members or the proposed Settlement Administrator, Apex Class Action LLC.

10. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected this Settlement.

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

Executed on 12/5/2025, at Oakland, California.

DocuSigned by:

 C9B26792FC2547A...

Gloria Nash