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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

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

KATIE MILLER, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

CONTERA CONSTRUCTION
CORPORATION, a California
Corporation; and DOES 1 through 20,
inclusive;

Defendants.

Case No.: CVRI2403479
*[Assigned to Hon. Harold W. Hopp, Dept 1, for
all purposes]*

**DECLARATION OF PLAINTIFF IN
SUPPORT OF MOTION FOR FINAL
APPROVAL**

I, Katie Miller, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of
all matters stated herein and could competently testify thereto.

2. I make this declaration in support of the motion for final approval of the class
action settlement. I believe that the settlement is fair and reasonable and constitutes a fair
resolution of the claims alleged.

3. During my employment with Contera Construction, there were several issues that
concerned me and which I thought did not comply with California law, such as not being paid for

1 my time worked and not getting proper meal breaks. Even though I was unsure if I wanted to
2 bring a lawsuit because of the risk of stepping forward as a whistle blower, I retained Lauby,
3 Mankin & Lauby LLP to proceed with this class action because I did not think that myself or the
4 other employees were being treated correctly.

5 4. When I first retained my attorneys (Lauby, Mankin & Lauby) and chose to pursue
6 this case on a class action basis, I understood that I had specific burdens as the “Class
7 Representative,” which included: (a) representing the interests of all class members, (2)
8 considering the interests of all class members above my own personal interests, (3) participating
9 actively in the lawsuit, including potential testimony at deposition and trial, and keeping
10 generally aware of the status and progress of the lawsuit. Moreover, I understood that any
11 resolution of the lawsuit is subject to court approval and must be designed in the best interests of
12 the class as a whole.

13 5. The settlement administrator advised that my current estimated shares of this
14 settlement are as follows: \$81.18 as my Individual Class Payment, and \$0 as my Individual
15 PAGA Payment. The Parties have also agreed to a service award (subject to this Court’s
16 approval) of \$5,000. I respectfully request that the Court approve the full service award
17 requested for the following reasons.

18 6. First, by bringing this case (and doing so as a class action), I undertook significant
19 risks and stresses at a high emotional cost without any guarantee of success. Filing this lawsuit
20 and being a whistle blower was stressful on a day-to-day basis as I have constantly worried about
21 the risk that this case could impact my ability to find future jobs, especially in the same industry.
22 Yet I still agreed to step forward to bring these claims, hoping to make a positive change and
23 recover what my coworkers and I were owed.

24 7. Second, I have spent substantial time working on this case and have performed
25 substantial services for the Class to help obtain a highly beneficial settlement for my fellow
26 employees. Since first initiating this action, I estimate that I have spent more than 40 hours
27 engaged in activities to benefit the class. I have assisted my attorneys in numerous ways,
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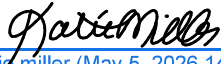
1 including helping to explain and discuss the company's practices and their general practices and
2 procedures, locating and analyzing company documents, and communicating with other class
3 members. These efforts occurred through numerous meetings with Class Counsel, telephone
4 conferences, letters, emails, and text communications. I also assisted in preparation for mediation
5 helped obtain a positive result for the class and reviewed all settlement documents.

6 8. Third, I respectfully request that the Court approve the agreed-upon service award
7 because I agreed to set aside my personal interests and to put the interests of the class ahead or
8 on par with my own. In doing so, and by successfully bringing this case as a class action, I
9 helped to obtain a highly beneficial settlement for the class members.

10 9. Fourth, bringing this case also came with a major financial risk because, if I lost
11 the case, I would be required to pay the company's costs.

12 10. For these reasons, and because my decision to step forward resulted in a very
13 favorable settlement for the other class members, I respectfully request that the Court approve
14 the \$5,000 service award.
15

16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct. Executed on 05/05/26, at Yucaipa, California.

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19 By: 
20 Katie Miller (May 5, 2026 14:24:43 PDT)
21 Katie Miller
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