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12 on behalf of others similarly situated and aggrieved
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14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF LOS ANGELES**

16 VICKY SEGURA, as an individual and on
17 behalf of all others similarly situated,

18 Plaintiff,

19 vs.
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21 COMMUNITY COMMERCE BANK, a
California corporation; and DOES 1
22 through 50, inclusive,

23 Defendants.
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Case No.: 24STCV21054

*[Assigned for all purposes to Hon. Elaine Lu,
Dept. 9]*

**DECLARATION OF VICKY SEGURA IN
SUPPORT OF PLAINTIFF'S UNOPPOSED
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA SETTLEMENT**

Date: March 18, 2026
Time: 10:00 a.m.
Department: 9

Opposition Due: February 26, 2026
Reply Due: March 4, 2026

Action Filed: August 19, 2024
Trial Date: Not set.

DECLARATION OF VICKY SEGURA

I, Vicky Segura, hereby declare as follows:

1. I am over the age of eighteen, have personal knowledge of the following, and if called as a witness could and would testify competently thereto.

2. I am the proposed class representative in this case. As a proposed class representative in this matter, I understand my duties toward the absent class members, including that I have a fiduciary duty towards them and accordingly must look out for their best interests. I understood and continue to understand that I have a responsibility to actively participate in the case. I was never offered anything to become a class representative.

3. I was employed by Defendant Community Commerce Bank (“Defendant”) as a non-exempt, hourly employee from approximately August 2023 to May 2024.

4. In bringing this case for myself, the class members, the State of California, and the aggrieved employees, I understood a lot of work would be required. I was willing to—and did do—the work to keep the case moving forward. Before I filed the lawsuit, I provided information regarding my employment with Defendant to my attorneys and spoke with them about my experience. I reviewed the Complaint. I also remained in contact with my attorneys for the duration of the case and reviewed all of the documents and correspondence they sent me. If this case had continued in litigation, I agreed to prepare for and testify in my deposition. If this case had gone to trial, I was prepared to participate in the trial, including by testifying.

5. When I joined this lawsuit, I assumed the risk that my significant expenditure of time and effort on behalf of the class would yield nothing. In addition, I assumed the risk that an eventual unfavorable judgment would tarnish my reputation and that the public filing of this lawsuit could have an adverse effect on future employment. I understood that I took on the risk, both professionally and financially, in pursuing the case as a representative action.

6. A mediation took place on June 24, 2025, with Steve Mehta, Esq., a well respected and experienced mediator. The mediation resulted in an agreement to settle the action. I communicated with my attorneys regarding the terms of the settlement that was reached between the parties and understood that the recovery in this case was for the benefit of my fellow coworkers, not just for me, and therefore wanted the best possible result to be obtained for the class members and aggrieved employees. I reviewed and signed the Memorandum of Understanding on June 24, 2025. I reviewed and signed the Class Action

1 and PAGA Settlement Agreement on November 17, 2025. I believe it is fair and reasonable given the facts
2 of this case.

3 7. I have been actively involved with this lawsuit. Although I did not keep time records, I was
4 in regular contact with my attorneys, reviewed court filings, and spent a significant amount of time on the
5 issues presented during the lawsuit and in the settlement process. I estimate that I spent approximately 30
6 hours working on this case up until this point.

7 8. I believe the \$10,000 Class Representative Service Payment I have requested is fair
8 compensation for my efforts in support of this action and the risks I undertook.

9 I declare under the penalty of perjury under the laws of the State of California that the foregoing
10 things are true and correct.

11 Executed February 6, 2026, at Ontario, California.

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13 DocuSigned by:
Vicky Segura
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Vicky Segura