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12 *Attorneys for Plaintiffs and Class Members*

13 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
14 **COUNTY OF ALAMEDA**

15 **CHARLES CASTILLO and DEIDRE BEAN,**  
16 individually and on behalf of all others similarly  
17 situated,

18 Plaintiffs,

19 vs.

20 **HOLY NAMES UNIVERSITY,** a California  
21 Non-Profit Corporation,

22 Defendant.

Case No.: HG21097245

**DECLARATION OF DEIDRE BEAN IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
ORDER GRANTING FINAL APPROVAL  
AND MOTION FOR APPROVAL OF  
ATTORNEYS' FEES, COSTS, AND SERVICE  
AWARDS FOR CLASS REPRESENTATIVES**

Date: May 2, 2023

Time: 3:00 p.m.

Dept.: 23

Hon. Brad Seligman

1 I, Deidre Bean, declare as follows:

2 1. I am over the age of 18 and have personal knowledge of the facts set forth in this  
3 declaration and could and would testify competently to them if called upon to do so in court.

4 2. I am one of the named Plaintiffs and PAGA Representatives in the above-referenced  
5 action.

6 3. I submit this Declaration in support of Plaintiffs' Motion for Order Granting Final  
7 Approval of the Class Action Settlement and Motion for Approval Attorneys' Fees, Costs, and Service  
8 Awards.

9 4. I was employed by Holy Names University ("HNU") as a part-time adjunct instructor to  
10 teach courses on a term-by-term basis between approximately 2013 and Fall 2020.

11 5. I was first in touch with my attorneys in approximately May 2021. During our first  
12 conversation I discussed with my attorney Ms. Brander my employment at HNU, including my dates of  
13 employment, the courses I taught, my typical teaching schedule, including the number of credits and  
14 credit hours I taught, the work I was expected to complete outside my teaching hours, including before  
15 the beginning of each term and after the end of each term, the compensation system applicable to me, as  
16 well as facts related to my teaching remotely from home during the COVID-19 pandemic. We also  
17 discussed my potential claims during this call and the Complaint that had been already filed in this case  
18 by Mr. Charles Castillo.

19 6. During this call, I agreed to act as a Class and PAGA representative. I carefully reviewed  
20 the representation agreement that my attorneys sent to me after our call, which also included a description  
21 of the obligations I was agreeing to take in representing the class.

22 7. As a Class and PAGA representative, I believe I have maintained the best interests of the  
23 Class Members and Aggrieved Employees. I have actively participated in this litigation and have  
24 regularly been apprised of the progress of the case by my attorneys. I have invested significant time and  
25 effort in performing my duties on behalf of the Class, including the following: discussing with my  
26 attorneys my claims, the facts related to my employment with HNU, and HNU's policies and practices  
27 applicable to me, searching for and providing my employment documents to my attorneys, as they asked  
28 me to do, discussing the facts and allegations in preparation of my attorneys drafting the Amended PAGA  
Notice and First Amended Complaint, participating in multiple calls with my attorneys and  
communicating with them by email throughout the case, conferring with my attorneys regarding  
mediation, and reviewing the mediation brief that was submitted on my behalf to the mediator.

8. My initial conversation with my attorneys and searching for and collecting documents to  
send to my attorneys took several hours in total. I estimate that I spent an additional three to three and a

1 half hours discussing my claims with my attorneys after our initial conversation, answering my attorney's  
2 questions, and reviewing case documents.

3 9. While I was not able to attend the mediation because of my work schedule, I made sure  
4 to be available by phone throughout the entire day, until the mediation concluded. After the mediation  
5 ended, I spoke to my attorneys to discuss the mediator's proposal, which I approved.

6 10. I carefully reviewed the long form settlement agreement that my attorneys sent to me and  
7 discussed it with my attorneys prior to signing it. This took approximately one to two hours.


8 11. After the formal settlement agreement was signed, I continued to stay in touch with my  
9 attorneys about the state of approval papers, the scheduling of the settlement approval hearing, the delay  
10 in the sending of the notice, and the scheduling of the final approval hearing.

11 12. I discussed with my attorneys the contents and purpose of this declaration, and reviewed  
12 and commented on it to ensure its accuracy.

13 13. In total, I estimate that I devoted approximately nine (9) hours to this case (not including  
14 the time on the day of the mediation when I made myself available).

15 14. In agreeing to represent the Class and Aggrieved Employees, I understood that there was  
16 a possibility that a class action would receive more notoriety than an individual action and that my name  
17 being associated with a class action could stigmatize me and affect my future employability in the  
18 education field. Nevertheless, I felt that the rights which this action seeks to enforce are important.

19 I declare under penalty of perjury under the laws of the United States and the State of California  
20 that the foregoing is true and correct. Executed on April 1, 2023.

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23 Deidre Bean  
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