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11 Attorneys for Petitioner and Plaintiff

12
13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 FOR THE COUNTY OF SAN BERNARDINO

15 CHRISTINA LOPEZ-BURTON, an
16 individual, on behalf of herself and all others
similarly situated,

17 Petitioner and Plaintiff,

18 v.

19 TOWN OF APPLE VALLEY, a general law
20 city; and DOES 1-10,

21 Respondents and Defendants.

Case No.: CIVDS1725027

Assigned for all purposes to Hon. David S. Cohn

**DECLARATION OF PLAINTIFF
CHRISTINA LOPEZ-BURTON IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS SETTLEMENT**

Petition/Complaint Filed: December 20, 2017

DATE: July 23, 2019
TIME: 8:30 a.m.
DEPT: S26

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24 I, Christina Lopez-Burton, declare as follows:

25 1. I am the Petitioner and Plaintiff in the above-entitled action. I have personal
26 knowledge of all of the facts stated below and if called upon, I could and would testify competently
27 thereto.
28

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

JUN 28 2019

BY Amber M. Gear
AMBER M. GEAR, DEPUTY

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2. I am an activist both at the local and state level. I have been following the activities of the Town of Apple Valley since 2006. I often attend Town Council meetings and read various reports and Council agenda items. I feel it is the responsibility of citizens to hold elected officials accountable for the decisions they make.

3. I filed this case in 2017 because I felt that the Town was taking advantage of its solid waste ratepayers. Prior to filing, I reviewed two government claims submitted to the Town (prepared by my attorneys) and the Petition and Complaint which I verified. Since the filing of the Petition and Complaint, I have closely monitored the progress of the case. In addition to regularly speaking to my attorney Eric Benink and exchanging emails with him about the status of the case, I have reviewed discovery responses and documents provided by the Town, deposition transcripts, our mediation brief and the voluminous briefs and supporting evidence prepared by my attorneys and the Town in response. I also assisted my attorneys in the preparation of responses to discovery that the Town propounded to me and gathered documents to produce to the Town.

4. This case has been, at times, stressful for me because during the past year I was frequently traveling to Colorado for extended periods to take care of my elderly mother who was ill. She passed away in January 2019. In February 2019, I ended up in the hospital with Pneumonia and Hypoxia due to the stress. I wanted to attend the first mediation on February 28, 2019, but I was still recovering from Pneumonia. I attended the mediation by telephone and spoke to Mr. Benink and the mediator Justice King (Ret.) throughout the day. I was feeling much better by the second mediation on March 22, 2019 and drove from Apple Valley to Ontario to attend in person. I participated throughout the entire mediation.

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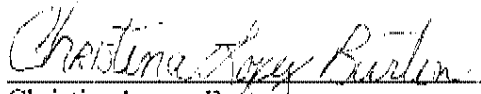
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5. I estimate that I have spent 50 hours working on this case.

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

Executed on June 25, 2019 in Apple Valley, CA.


Christian Lopez-Burton