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16 *Attorneys for Plaintiffs*

17 UNITED STATES DISTRICT COURT
18 FOR THE NORTHERN DISTRICT OF CALIFORNIA
19 OAKLAND DIVISION

20 DANIEL BERMAN, STEPHANIE
21 HERNANDEZ, and ERICA RUSSELL,

22 Plaintiffs,

23 v.

24 FREEDOM FINANCIAL NETWORK, LLC,
25 FREEDOM DEBT RELIEF, LLC, FLUENT,
26 INC., and LEAD SCIENCE, LLC,

27 Defendants.

Case No. 4:18-cv-01060-YGR

**DECLARATION OF STEPHANIE
HERNANDEZ IN SUPPORT OF
SETTLEMENT**

JURY TRIAL DEMAND

Honorable Yvonne Gonzalez Rogers

DATE:
TIME:
LOCATION:

28 I, Stephanie Hernandez, declare as follows:

1. I am an adult over 18 years of age. I make the following declaration based on my personal knowledge. I am able to competently testify on the facts in this declaration.

1 2. I have personal knowledge of the facts described in this declaration. I could and
2 would testify to them if called up on to do so.

3 3. I live in King City, California.

4 4. I have a cell phone. My cell phone's telephone number begins (831) 320. I have
5 had that number for more than twenty years.

6 5. Between March 5 and 7 2018 I received two prerecorded voice calls to my cell
7 phone selling Defendants' products. I had not given the caller permission to place those calls. I
8 also received four text messages without my permission.

9 6. Throughout this lawsuit, I have worked with my lawyers by answering their
10 questions and responding to Defendants' written questions. When they asked, I provided several
11 pages of documents, which I understand have been given to the Defendants in this case. I also
12 worked with my lawyers to obtain additional records from my cellular service provider through a
13 third-party subpoena.

14 7. I spent several hours during the pandemic with my lawyers preparing for my
15 deposition. My husband drove me to Paso Robles for my deposition. Paso Robles is
16 approximately an hour from my home. The deposition took place on July 2, 2020, which was
17 right at the beginning of the Covid 19 pandemic. The deposition took place in a conference room
18 where I was by myself. The court reporter and all the lawyers attended by video. The deposition
19 lasted from 10:00 a.m. to around 12:30 p.m.

20 8. I worked with my attorneys to provide a sworn statement about the spam calls I
21 received. I understand my attorneys filed that statement with the Court when Defendants tried to
22 force my case into arbitration.

23 9. I talked to my lawyer about the settlement. It was important to me that the
24 settlement provided money for the other people who received robocalls from Defendants. I
25 support the settlement.
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED in King City, California this 16 day of March, 2023.

DocuSigned by:
Stephanie Hernandez
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Stephanie Hernandez