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21 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
22 **COUNTY OF CONTRA COSTA**

23 STAR JOSHUA, individually and on behalf of all
24 others similarly situated,

25 Plaintiff,

26 v.

27 THE COUNTY OF CONTRA COSTA; MARC
28 SHORR, in his official capacity; and DOES 1
through 100, inclusive,

Defendants.

Case No. C23-01684

**DECLARATION OF PLAINTIFF STAR
JOSHUA IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

1 I, Star Joshua, declare:

2 1. I am over the age of 18 and the named Plaintiff in the above-captioned matter and proposed
3 class action against Defendants County of Contra Costa (“County”) and Marc Shorr (together with County,
4 “Defendants”). If called as a witness, I would competently testify to the matters herein from personal
5 knowledge.

6 2. I am filing this declaration in support of Plaintiff’s Unopposed Motion for Preliminary
7 Approval of Class Action Settlement.

8 3. I worked for Contra Costa County from approximately 2019 through 2021. I was required
9 to provide my PII when I applied for employment with Defendant with the understanding that my
10 information would be protected, maintained, and safeguarded from unauthorized use or disclosure. I have
11 also received medical care from various clinics and facilities operated by the Contra Costa County.

12 4. I received a notice about the data breach from County on or about May 10, 2023. I provided
13 County with my PII, including but not limited to my name, Social Security number, driver’s license
14 number, and government issued identification numbers, and understand that my PII was likely stolen.

15 5. Since the data breach, I have made reasonable efforts to mitigate the impact of the data
16 breach, including but not limited to, researching the data breach and reviewing credit reports and financial
17 account statements for any indications of actual or attempted identity theft or fraud.

18 6. I have also experienced identity theft since the data breach. Someone tried to open a bank
19 account at Arvest Bank using my Social Security Number, and I received a notice from the IRS about
20 someone trying to file 2023 tax returns using my Social Security Number.

21 7. Since the data breach, I have also experienced a substantial increase in suspicious scam
22 phone calls and emails, all of which appear to be placed with the intent to obtain additional personal
23 information from me to commit identity theft by way of a social engineering attacks.

24 8. I initiated contact with my attorneys regarding the data incident in which my PII was
25 potentially exposed to unauthorized individuals, and subsequently commenced this lawsuit against
26 Defendants. I also entered into a written representation agreement with my attorneys. The main purpose
27 of the lawsuit is to stop and/or correct what I believe to be an unlawful business practice by Defendants
28

1 in systematically failing to protect personal information they collected about me and other similarly
2 situated individuals.

3 9. Before commencing this lawsuit, my attorneys informed me of the responsibilities of a
4 class representative. I understand these responsibilities include assuming fiduciary responsibility to
5 prosecute the lawsuit on behalf of absent class members; make the decision to initiate the lawsuit; assist
6 with discovery, sit for a deposition, and—if the class is certified—assist with the trial, including appearing
7 and testifying in court, and working with Class Counsel on behalf of the absent class members. Further, I
8 am willing and prepared to put the interest of absent class members before my own and seek an outcome
9 that is in the best interest of absent class members.

10 10. Through my attorneys, I have reviewed the complaint and other filings and had the
11 opportunity to provide input and feedback. Moreover, I discussed this matter at length on several occasions
12 with my attorneys to assist in the investigation and discovery process before and after this case was filed.

13 11. I spent several hours reviewing, investigating, and assisting my attorneys carefully, fully,
14 and accurately to prepare the complaint, which included researching specific historical facts about my
15 personal background and a time-consuming review of my personal records.

16 12. To my knowledge, I have no interest that is not in line with the class members, who I
17 understand are people who also had their PII improperly exposed.

18 13. To my knowledge, I have no conflict of interest with my attorneys.

19 14. I believe my attorneys are experienced in representing consumers in class action cases, and
20 I respectfully request that they be appointed to represent the class members.

21 15. I consulted with my attorneys regarding the risks and expenses of continued litigation
22 through trial and possible appeal, and regarding the benefits conferred by the proposed Settlement. My
23 attorneys have kept me fully informed of the status of the litigation and particularly regarding the
24 settlement process and discussions and the proposed Settlement.

25 16. I reaffirm my commitment to prosecute this case and assist my attorneys for the benefit of
26 absent class members.

27 17. I believe the terms of the proposed Settlement are fair and reasonable to the class.
28

1 18. There are no side agreements, and I am not receiving any special benefits through this
2 Settlement as a result of my position as a Class Representative.

3 19. I respectfully request to be appointed as a Class Representative in this action.

4 20. I also support the Settlement and respectfully request the Court grant Preliminary Approval
5 of the Class Action Settlement.

6 I declare under penalty of perjury under the laws of California and the United States of America
7 that the foregoing is true and correct. Executed this Apr 1, 2025, at Stockton, California.

8
9 Star Joshua
 Star Joshua (Apr 1, 2025 15:59 PDT)
10 Star Joshua

Contra Costa - Joshua Decl ISO MPA FINAL

Final Audit Report

2025-04-01

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"Contra Costa - Joshua Decl ISO MPA FINAL" History

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