

ELECTRONICALLY FILED
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County of Sonoma
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16
17 *Attorneys for Individual and Representative Plaintiffs*

18
19 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
20 **FOR THE COUNTY OF SONOMA**
21 **CIVIL UNLIMITED**

22 SHARON FELKER; HERMAN GRISHAVER;
23 EDGAR CRUZ SORIANO; and JEANACE
ZETINO, individually and on behalf of other
similarly situated individuals,

24
25 **Plaintiffs,**

26 vs.

27 JRK RESIDENTIAL GROUP, INC.; JRK
28 PROPERTY HOLDINGS, INC.; and DOES 1-
100,

29
30 **Defendants.**

Case No.: SCV-267587

DECLARATION OF EDGAR CRUZ SORIANO

Complaint Filed: December 22, 2020
Trial Date: N/A

1 1. My name is Edgar Cruz Soriano.

2 2. I was a resident of JRK's apartment complex in Petaluma, California, known as
3 The Vineyard and later The Grove, from 2009 to 2019. I have been a named plaintiff in this case
4 since the case was filed in December 2020.

5 3. The total amount of time I spent doing things related to this case is approximately
6 50 hours. The things I did include my deposition, meeting with my lawyers, reviewing
7 documents, collecting documents, and following the progress of the case.

8 4. I was questioned by JRK's lawyer on January 24, 2024. The deposition took more
9 than four and a half hours and I had to request a day off work for the deposition. Before the
10 deposition, I had multiple phone calls and meetings with my lawyers. I spent several hours
11 preparing for the deposition with them. I am a native Spanish speaker, and I required an
12 interpreter for the deposition and for much of the communication I had with the lawyers. This
13 required extra time. I was asked questions in my deposition about things of a personal nature,
14 including my family life, my personal finances, and my work history. I estimate in total I spent
15 up to 15 hours preparing for my deposition and doing my deposition.

16 5. I reviewed several documents that JRK sent to my lawyers where I was asked to
17 answer questions or give them documents. These documents were written in English and I
18 needed the help of a translator or interpreter to understand them. I was asked to review all of the
19 responses my lawyers wrote to make sure that the things they said were correct. I was also asked
20 to review other documents, like the complaints and other documents filed with the court. Some
21 of these documents were written in Spanish, and others were written in English and required an
22 interpreter. I estimate in total I spent approximately 10 hours of reading through all the
23 documents, having documents read to me in Spanish, and talking with my lawyers about the
24 responses.

25 6. I also had to gather personal documents for the case and send them to my lawyers.
26 I had to provide financial documents, pictures, rental history, and other documentation about my
27 tenancy. I estimate this took me approximately 10 hours to get all these records together and
28 send them to my lawyers.

29 7. I estimate I had more than 10 meetings and calls with my lawyers about the case.
30 In total, I estimate the time I spent communicating with my lawyers about the case was at least
31 15 hours. These calls, meetings and other communications often required an interpreter.
32

1 This document was executed in Sonoma County, California and was read to me in
2 Spanish. I declare under penalty of perjury under the laws of the State of California that the
3 foregoing is true and correct and based upon my personal knowledge, and that if called upon to
4 testify, I could verify the accuracy of the same.

5
6
7 Dated: 10/21/2025

8 Edgar Cruz

9 Edgar Cruz Soriano