

1 Joshua Katz (SBN 194512)
Law Office of Joshua Katz
2 144 South E Street, Suite 206
Santa Rosa, California 95404-4794
3 707-546-4510 telephone
4 707-575-6014 facsimile
jkatz@sonomalegal.com

5 Todd Espinosa (SBN 209591)
6 Law Office of Todd Espinosa
2000 Broadway Street
7 Redwood City, California 94063
8 650-241-3873 telephone
650-409-2550 facsimile
9 tie@toddespinosalaw.com

10 Julie C. Erickson (SBN 293111)
11 Elizabeth A. Kramer (SBN 293129)
Kevin M. Osborne (SBN 261367)
12 Erickson Kramer Osborne LLP
959 Natoma Street
13 San Francisco, CA 94103
415-635-0631 telephone
14 415-599-8088 facsimile
15 julie@eko.law, elizabeth@eko.law,
kevin@eko.law

16
17 *Attorneys for Individual and Representative Plaintiffs*

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

21
22 SHARON FELKER; HERMAN GRISHAVER;
EDGAR CRUZ SORIANO; and JEANACE
23 ZETINO, individually and on behalf of other
similarly situated individuals,

24 Plaintiffs,

25 vs.

26
27 JRK RESIDENTIAL GROUP, INC.; JRK
PROPERTY HOLDINGS, INC.; and DOES 1-
28 100,

29 Defendants.

Case No.: SCV-267587

DECLARATION OF JEANACE ZETINO

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

1 1. My name is Jeanace Zetino.

2 2. I was a resident of JRK's apartment complex in Petaluma, California, known as
3 The Vineyard and later The Grove, from 2018 to 2023. I have been a named plaintiff in this case
4 since the case was filed in December 2020.

5 3. My estimate for the total amount of time I have spent doing things related to this
6 case is at least 50 hours. This included collecting documents, reading the documents that were
7 filed in the case, having phone calls, virtual and in-person meetings and writing emails with my
8 attorneys, preparing for and sitting for my deposition, reviewing and signing lengthy written
9 discovery responses, and following the case in the news.

10 4. I was questioned by JRK's lawyer for more than six hours in deposition on
11 January 25, 2024, where I took a full day off work. I also spent several hours before the
12 deposition preparing with my lawyers. The topics I was asked about in my deposition included
13 very personal things, including questions about my personal finances, my family and my work
14 history. I estimate in total I spent up to 15 hours in deposition and preparing for deposition.

15 5. I read through lengthy discovery documents from the case to make sure that the
16 things they said were accurate. Some of the papers were about the case, while others were
17 discovery questions asked by the Defendants. I also had to answer the discovery questions and
18 provide amended answers, which I did during phone calls and meetings with my lawyers. I
19 estimate taking approximately 10 hours of reading through all the documents and talking with
20 my lawyers about the responses.

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

25 7. I also spent time reviewing the documents my lawyers filed in the case, including
26 the complaints they filed, and speaking with my lawyers about the documents, about the case
27 generally and about settlement terms. Over the past five years, I would estimate the number of
28 calls and meetings I had with my lawyers about the case was more than 20. In total, I estimate
29 the time I spent reviewing documents, speaking with my lawyers about the case was at least 15
30 hours.

31
32

1 8. Over the course of the case there were many days I had to take off work or was
2 sick due to the stress and exhaustion. I estimate in total I spent an aggregate of two weeks taking
3 time off to deal with the rent and fees that were being charged to my tenant ledger and credit file.

4 9. This case was in the news, including in The Press Democrat, and the North Bay
5 Business Journal. Because the case was so public and because I was still living at The Vineyard.
6 I was always concerned that it might affect my relationship with JRK and their treatment of me
7 and my husband as tenants.

8 This document was executed in Sonoma County, California. I declare under
9 penalty of perjury under the laws of the State of California that the foregoing is true and correct
10 and based upon my own personal knowledge, and that if called upon to testify, I could verify the
11 accuracy of the same.

12
13 Dated: Oct 6, 2025

Jeanace Zetino

Jeanace Zetino






J. Zetino Decl ISO Mtn Preliminary Approval

Final Audit Report

2025-10-07

Created:	2025-10-06
By:	Todd Espinosa (tie@toddespinosalaw.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAvHW5L6TYc2SQEBhqzvil9RGxG9Py2EKR

"J. Zetino Decl ISO Mtn Preliminary Approval" History

-  Document created by Todd Espinosa (tie@toddespinosalaw.com)
2025-10-06 - 5:40:46 PM GMT- IP address: 76.102.207.247
-  Document emailed to Jeanace Zetino (jeanacez@hotmail.com) for signature
2025-10-06 - 5:41:35 PM GMT
-  Email viewed by Jeanace Zetino (jeanacez@hotmail.com)
2025-10-07 - 0:27:54 AM GMT- IP address: 67.170.215.189
-  Document e-signed by Jeanace Zetino (jeanacez@hotmail.com)
Signature Date: 2025-10-07 - 0:29:18 AM GMT - Time Source: server- IP address: 67.170.215.189
-  Agreement completed.
2025-10-07 - 0:29:18 AM GMT