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ELECTRONICALLY FILED
Superior Court of California
County of Santa Barbara
Darrel E. Parker, Executive Officer
9/19/2023 10:23 AM
By: Madelyn Mercer , Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA

OLIVIA ROSE RAMIREZ and KRYSTAL
PECORARO, as individuals and on behalf of all
others similarly situated,

Plaintiffs,

v.

WYNDHAM VACATION OWNERSHIP, INC.,
a Delaware Corporation; and DOES 1-100,

Defendants.

Case No. 20CV01715

*[Assigned for all purposes to the Hon. James
F. Rigali, Dept. 2]*

**DECLARATION OF OLIVIA ROSE
RAMIREZ IN SUPPORT OF
APPROVAL OF CLASS ACTION
SETTLEMENT**

Action Filed: April 17, 2020

Trial Date: None Set

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I, Olivia Rose Ramirez, declare as follows:

1. I am an individual over the age of 18 and am the named Plaintiff in this matter.

This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Defendant Wyndham Vacation Ownership, Inc. (“Wyndham”) in California between May 2016 and February 2019. Some of the job titles I held during that time were housekeeper and guest services agent. However, in both positions, I clocked in and out using an electronic timekeeping system. During my employment, I received bonuses for good attendance and for hitting the goals set by my department. Because I had to clean rooms quickly or stay at the front desk to check guests in, I was expected to delay, shorten, or even skip my meal period on many occasions. When I worked long shifts over 10 hours I did not get to take a second meal period. This issue extended to my 10-minute rest periods as well because I was regularly not able to step away from my duties for those breaks. I do not believe I received any extra pay for not receiving all of my meal or rest periods during my employment. Because of these issues, I believe Wyndham did not issue me accurate wage statements or pay me all wages I was owed when I left.

3. I initiated this lawsuit against Wyndham because I wanted Wyndham to follow the law and be fair to its workers. I feel that I have taken on a greater burden than any of the other Wyndham employees because I have been actively involved in the litigation, and because it is my name that is attached to the lawsuit. Even though I understood that this lawsuit would be a public record, I accepted that burden for the benefit of Wyndham's other workers.

4. I was a significant part of this case even before it was filed. Some of the tasks I performed include, gathering and reviewing relevant employee policy documents and wage statements for use in the lawsuit, providing information about Wyndham's policies and practices at my resort, including the timekeeping and bonus programs, and helping identify other employees who also experienced the same issues that I did. I also made myself available the entire

1 day of mediation to answer my attorneys' questions. I estimate that I have spent at least 15 total
2 hours on these activities.

3 I declare under penalty of perjury under the laws of the state of California and the United
4 States that the foregoing is true and correct. Executed on Jun 6, 2023, in Lompoc,
5 California.

6 
Olivia Ramirez (Jun 6, 2023 15:43 PDT)

Olivia Rose Ramirez