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Attorneys for Plaintiff, DARREN MULLER, on
behalf of himself and all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SOLANO**

DARREN MULLER on behalf of himself
and all others similarly situated,

Plaintiff,

vs.

PARK MANAGEMENT CORP. dba SIX
FLAGS DISCOVERY KINGDOM, a
California corporation, and DOES 1
through 50, inclusive,

Defendant.

Case No. FCS054401
ASSIGNED FOR ALL PURPOSES TO:
JUDGE: Hon. Stephen Gizzi
DEPT.: 3

**DECLARATION OF DARREN MULLER IN
SUPPORT OF FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: 12-15-2022
Time: 9:30 a.m.
Dept.: 3

DECLARATION OF DARREN MULLER

I, Darren Muller, declare as follows:

1. I am the Named Plaintiff and proposed Class Representative in the matter styled,
Darren Muller v. Park Management Corp. dba Six Flags Discovery Kingdom., Case no.
FCS054401. I know the facts declared herein to be true of my own personal knowledge and if
called as a witness, I could and would competently testify thereto.

2. I was employed by Park Management Corp. dba Six Flags Discovery Kingdom
("Six Flags" or "Defendant") from in or about May 2019 through in or about June 2019. During
my employment with Six Flags, I was a non-exempt, hourly-paid employee and worked as a
cashier in stores located throughout the park.

1 3. Prior to retaining the law firm of James Hawkins APLC to redress the grievances
2 that I had against Six Flags, James Hawkins APLC informed me of the advantages and
3 disadvantages of litigation, and of my responsibilities as both a Plaintiff and a Class
4 Representative.

5 4. By deciding to litigate my claims as part of this class action, I agreed to pursue not
6 only my own potential wage and hour claims, but the claims of all similarly situated employees,
7 and when necessary, to put the interests of the class ahead of my own. I pledged to participate
8 actively in the lawsuit.

9 5. As a Class Representative, I am aware that I represent the interest of the class
10 members in this litigation and of my fiduciary duty to the putative class members. I am not aware
11 of any interests adverse to the interests of the proposed class members, and I am, and have been,
12 committed to vigorously prosecuting the case on behalf of the class. I have adhered to my
13 commitment and duty to the class including foregoing the opportunity to settle my individual
14 claims against Six Flags early on in this litigation.

15 6. As a Class Representative, I continuously interacted with my attorneys to discuss
16 the status of the case and I provided relevant oral and documentary information necessary to
17 prosecute the class claims. I provided information to my attorneys which helped in the discovery
18 requested from Six Flags.

19 7. By agreeing to bring this action, I formally accepted the responsibilities of
20 representing the interests of class members in California and willingly chose to assume risks and
21 potential costs that I alone might have to bear if judgement would have been rendered in favor of
22 Six Flags.

23 8. As part of the Class Action Settlement, I also signed a general release releasing all
24 claims I have or may have against Six Flags, which is far broader than the release by the class
25 members.

26 9. I also risked the potential stigma of being the named plaintiff in a representative
27 action labor dispute which could affect my further employability in the industry or with any
28 prospective employer who learns of my lawsuit against a former employer.

Executed this 11 day of November, 2022 at Roseville, California

DocuSigned by:

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Darren Muller