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Attorneys for Plaintiff Cristina Dennis, on behalf of herself and all "aggrieved employees"
pursuant to Labor Code § 2698 et seq.

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

CRISTINA DENNIS, on behalf of herself
and all "aggrieved employees" pursuant to
Labor Code § 2698 et seq.,

Plaintiffs,

v.

PARKER PALM SPRINGS, LLC, a
Delaware limited liability corporation, and
DOES 1 through 10, inclusive,

Defendants.

CASE NO: PSC2002340

Assigned to Hon. Sunshine Sykes, Dept. 6

**DECLARATION OF CRISTINA
DENNIS IN SUPPORT OF MOTION
FOR AN ORDER AND JUDGMENT
APPROVING SETTLEMENT OF
CLAIMS BROUGHT PURSUANT TO
THE PRIVATE ATTORNEYS
GENERAL ACT OF 2004, AWARDING
ATTORNEYS' FEES, COSTS,
GENERAL RELEASE PAYMENT,
ANDREIMBURSEMENT OF
SETTLEMENT ADMINISTRATION
EXPENSES**

Date: August 25, 2021

Time: 8:30 a.m.

Dept.: 6

Reservation ID #: 517075065933

Complaint Filed: June 5, 2020

1 I, Cristina Dennis, hereby declare and state as follows:

2 1. I am the named Plaintiff in this lawsuit against Parker Palm Springs, LLC, a
3 Delaware limited liability corporation ("Defendant") and I submit this declaration in support of
4 Plaintiff's Unopposed Motion for an Order and Judgment Approving Settlement of Claims
5 Brought Pursuant to the Private Attorneys General Act of 2004, Awarding Attorneys' Fees, Costs,
6 General Release Payment, and Reimbursement of Settlement Administration Expenses. I am a
7 competent adult and was employed by Defendant as a non-exempt employee in California during
8 the relevant time period. I have personal knowledge of the facts set forth herein, and if called as
9 a witness to testify to them, I could and would do so competently.

10 2. I contacted my current attorneys when I questioned the employment practices of
11 Defendant prior to commencing this lawsuit. I accepted the opportunity to act as a representative
12 on behalf of other employees of Defendant in this action whom I believed were being subjected to
13 labor law violations. Although presented with the opportunity, I did not pursue any case on an
14 individual basis and instead did so as a representative action so that I could help other employees
15 recover for what I believed were Defendant's improper practices.

16 3. Specifically, I questioned Defendant's policies of failing to provide rest periods to
17 its non-exempt California employees. Through many discussions with my lawyers, and through
18 my own research on the Internet, I learned these may be illegal practices and Defendant's non-
19 exempt employees might have recourse for them.

20 4. By bringing this lawsuit, and throughout its course, I have put the interests of other
21 employees ahead of my own. I understood that I could possibly earn an incentive award if this
22 case resolved itself favorably, but I also knew that I could also be responsible for paying
23 Defendant's attorneys' fees and costs if it did not. My goal in bringing this lawsuit was to obtain
24 a recovery on behalf of all employees of Defendant, and even more importantly, to put an end to
25 what I believed were illegal practices on the part of Defendant. I believe I have achieved both
26 through this lawsuit and settlement.

1 5. I am very happy about the results of this litigation. I am satisfied that Defendant is
2 compensating other aggrieved employees and the State for penalties that I believe we are due.

3 6. At the onset of this case, I spent time through numerous phone calls with several of
4 my attorneys explaining what I understood to be Defendant's policies and practices and how they
5 were applied to other employees. I kept actively involved with the status of this case throughout
6 the litigation process, tracking the status of the case and participating as much as possible.

7 7. While I have not maintained detailed time records of my activities in connection
8 with this litigation, I believe that I have spent a total of approximately 15-20 hours assisting my
9 attorneys with the preparation of this case and doing work and investigation of the facts
10 independent from my attorneys both before and during this case.

11 8. Before this litigation commenced, and throughout its course, I spent approximately
12 3-4 hours gathering, organizing, and reviewing documents and information for this lawsuit. I
13 sifted through many of my own documents and reviewed information produced by Defendant as
14 part of this litigation.

15 9. I communicated with my attorneys several times per month to track my case's status.
16 I have taken an active involvement in this matter throughout its course.

17 10. Taking the initiative with this case was very risky for me, both professionally and
18 financially. I put principal first and took a tremendous risk by filing this lawsuit. I am quite
19 confident that pursuing this lawsuit will result in future reputational harm to me. There is a stigma
20 associated with suing your former employer. I suspect I may be adversely affected when it comes
21 to obtaining future employment – employers who discover that I sued Defendant in a
22 representative action will likely avoid hiring me.

1 I declare, under penalty of perjury, under the laws of the State of California that the
2 foregoing is true and correct.

July 8, 2021

3 Executed on this ____ day of July 2021 at Yucca valley, California.

DocuSigned by:

Cristina Dennis

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CRISTINA DENNIS