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Attorneys for Plaintiff ALEXANDER CASTELLANOS

SUPERIOR COURT OF THE STATE OF CALIFORNIA**IN AND FOR THE COUNTY OF SAN DIEGO**

ALEXANDER CASTELLANOS, an
individual, on behalf of himself, and on behalf
of all persons similarly situated,

Plaintiff,

vs.

SOUTHWEST SECURITY PATROL, INC.,
d.b.a. SOUTHWEST PATROL, a California
corporation; and DOES 1 through 50, Inclusive;

Defendants.

Case No. 37-2020-00024905

**DECLARATION OF ALEXANDER
CASTELLANOS IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: October 29, 2021

Time: 8:30 a.m.

Judge: Hon. Keri Katz

Dept.: 74

I, ALEXANDER CASTELLANOS, declare as follows:

1. I am over eighteen years of age and if called as a witness, I could and would competently testify to the following facts from my own personal knowledge. I am the lead named Plaintiff in the above wage and hour class action filed against SOUTHWEST SECURITY PATROL, INC., d.b.a. SOUTHWEST PATROL; (hereinafter "Defendant").

1 2. This declaration is being submitted in support of Plaintiff's motion for Preliminary
2 Approval of Class Action Settlement.

3 3. I believe that I am, have been and will continue to fairly and adequately represent the
4 interests of the class I am seeking to represent and that I have claims that are typical of the claims the
5 Settlement Class that I am seeking to represent. Specifically, I was employed by Defendant as a non-
6 exempt employee assigned to the banquets department at the Westgate Hotel in San Diego during the
7 Class Period. Accordingly, I am a member of the Settlement Class that I am seeking to represent.

8 4. Additionally, my claims are typical of the claims of the Settlement Class Members that
9 I am seeking to represent because I was subject to the same alleged unlawful employment policies and
10 practices at issue in this action, including but not limited to, Defendants' failure to provide complaint
11 meal and rest periods, failure to pay for all hours worked, failure to reimburse mandatory business
12 expenses. Factually, Defendant's policies and practices apply class wide, and Defendant's liability can
13 be determined by facts common to all members of the Settlement Class.

14 5. Further, there is no conflict between my interests and the interests of the class that I am
15 seeking to represent. My interests are entirely coextensive with the interests of the Settlement Class.
16 Plaintiff alleges that they were injured by the same company-wide practices to which the proposed
17 Settlement Class was subject and seeks the same relief. I have already demonstrated the ability to
18 advocate for the interests of the Settlement Class by initiating this litigation, undertaking extensive
19 class discovery, and evaluating the proposed settlement to assure that it is fair.

20 6. I understood at the time that I filed this action, that as a Class Representative, I owed a
21 duty to the putative class members to faithfully prosecute this action with their best interests at the
22 forefront of every decision. I understood that I could not make any decision in this action for the sole
23 benefit of my personal interest. I understood that in executing this duty, I might have been asked to
24 sacrifice my personal best interests for the benefit of the interests of the putative class members.
25 Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible
26 relief for my former co-workers for what I perceived to be Defendant's unlawful wage and hour
27

practices. I believe that I faithfully executed the duties of a Class Representative throughout this litigation and will continue to do until this litigation is fully and finally resolved.

7. I believe that the proposed settlement before the Court is fair, reasonable and adequate, and made in the best interest of the Settlement Class Members. Consequently, I respectfully, and humbly, I ask the Court to grant preliminary approval of the Settlement and all of its terms.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed 10/1/2021, at 5:18pm, California

DocuSigned by:
By: A. C.
ALEXANDER CASTELLANOS
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