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Attorneys for Plaintiff Rocio Rosales,
individually, and on behalf of all other similarly situated employees

SUPERIOR COURT OF STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

ROCIO ROSALES and ERICKA KRAUT, as
individuals and on behalf of others similarly
situated,

Plaintiffs,

vs.

DT EMPLOYER, LLC, a California limited
liability company; DT MANAGEMENT, LLC,
a California limited liability company;
DOUBLETREE EMPLOYER, LLC, a
California limited liability company; HILTON
EMPLOYER, INC., a California corporation;
HILTON HOTEL EMPLOYER, LLC, a
California limited liability company;
EMBASSY SUITES EMPLOYER, LLC, a
California limited liability company; CURIO
EMPLOYER, LLC, a California limited
liability company; HAMPTON INNS
EMPLOYER, LLC, a California limited
liability company; HLT CONRAD
DOMESTIC EMPLOYER, LLC, a California
limited liability company; HLT CONRAD

Case No.: CIVSB2132004

Assigned for all purposes to:
Hon. David S. Cohn
Dept. S26

**DECLARATION OF PLAINTIFF ROCIO
ROSALES IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Date:
Hearing Time:
Department:

1 DOMESTIC, LLC, a California limited
2 liability company; CONRAD EMPLOYER,
3 LLC, a California limited liability company;
4 WALDORF-ASTORIA EMPLOYER, LLC, a
5 California limited liability company;
6 HOMEWOOD SUITES EMPLOYER, LLC, a
7 California limited liability company; and
8 DOES 1 through 100, inclusive,
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Defendants.

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1 my fellow Class Members. Nor do I believe I have any interest in the outcome of this case that is in
2 conflict with the interests of the rest of the Class Members. As part of fulfilling my duties as a class
3 representative for this lawsuit, I made and performed the following duties. (1) I represented the
4 interest of all class members; (2) I always considered the interest of the Class just as I would consider
5 my own interests and put the interests of the Class before my own interests; (3) I served as one of
6 the fiduciaries of the Class; (4) I actively participated in the lawsuit by searching for documents,
7 keeping in contact with my attorneys, and answering their questions as needed; and (5) I followed
8 the progress of the lawsuit and provided all relevant information to my attorneys.

9 9. To achieve this settlement, I believe I have done everything my attorneys have asked
10 of me, and have given my best efforts to represent the Class Members. Throughout the course of
11 this litigation, I participated in every step of the litigation from the case initiation, the filing of the
12 amended complaints, the mediation, the settlement agreement review and execution as well as the
13 approval process

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15 I declare under the penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct. Executed on this 16th day of October 2024 in Irvine, California.

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19 Rocio Rosales, Declarant
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