

Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Brian J. St. John (SBN 304112)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs

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

ERIN JONES, individually on behalf of
themselves, and on behalf of all persons
similarly situated,

Plaintiff,

vs.

JW MARRIOTT ANAHEIM RESORT, an
unknown business entity; MARRIOTT
INTERNATIONAL, INC., an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 30-2021-01183306-CU-OE-CXC

Honorable Melissa R. McCormick
Department CX104

CLASS ACTION

**DECLARATION OF ERIN JONES IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: April 11, 2024

Time: 2:00 p.m.

Department: CX104

Complaint Filed: February 8, 2021

FAC Filed: May 13, 2021

Trial Date: None Set

DECLARATION OF ERIN JONES

I, **Erin Jones**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am a named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Marriott International, Inc. ("JW Marriott") as an hourly-paid guest experience expert from February 2020 to March 2020. I decided to seek legal advice about my work experiences with JW Marriott and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure JW Marriott was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **6 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **8 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over **16 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with JW Marriott, reviewing documents with my attorneys, answering questions, and providing guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from JW Marriott. I routinely checked in with my attorneys and their staff to make sure that they had all my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them

as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **10 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, describing policies, practices, and procedures of JW Marriott. During the discovery phase of the litigation, I spent approximately **7 additional hours** reviewing JW Marriott's discovery requests and deposition notices, locating documents, and providing documents and responses to my attorneys.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about **2 hours** reviewing the settlement agreement and about **2 hours** asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class. I think my efforts helped to get the result obtained in this case, and as a class, I respectfully request that the Court award me an enhancement payment in the amount of \$5,000.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

7. I am not related to anyone associated with Lawyers *for* Justice, PC, or Blumenthal Nordrehaug Bhowmik De Blouw LLP.

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

01/03/2024

Executed this ____ day of January 2024, at Los Angeles, California.

Electronically Signed 2024-01-03 23:14:47 UTC - 216.24.210.163

Nintex AssureSign® 9105d215-d15b-4ff7-85de-b0ec0021959a

Erin Jones