

Joanna Ghosh (SBN 272479)
Daniel Bass (SBN 287466)
Brian St. John (SBN 304112)
LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff Harmesh Bangar

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA

SUNIA HALATOYA, HARMESH BANGAR,
individually, and on behalf of other members
of the general public similarly situated and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiffs,

vs.

DIABLO COUNTRY CLUB, an unknown
business entity; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: MSC21-01549 (Lead Case)
Consolidated Case No(s): MSC21-02000

Honorable Benjamin T. Reyes II
Department 16

CLASS ACTION

**DECLARATION OF HARMESH
BANGAR IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: August 5, 2026
Time: 9:00 a.m.
Department: 16

Complaint Filed: July 26, 2021
FAC Filed: January 10, 2025

Trial Date: None Set

DECLARATION OF HARMESH BANGAR

I, Harmesh Bangar, 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 Diablo Country Club ("Defendant") from approximately February 1986 to approximately May 2024 as a non-exempt employee. I learned about this case and decided to contact Lawyers for Justice, PC to speak with attorneys there about my experience working for Defendant. I wanted to help with the case and make sure Defendant was held accountable for not properly compensating its employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers for Justice, PC 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, class representative, and a PAGA representative. Prior to joining the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Since my involvement in the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other non-exempt employees, and reviewing the potential settlement to ensure it was fair, reasonable, adequate, and in the best interest of the class. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. Since my involvement in this matter, 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

1 many documents as I could. I spent time speaking with my attorneys about the case, providing my
2 attorneys with documents and information concerning the case, and also describing policies,
3 practices, and procedures of Defendant.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I reviewed the Settlement Agreement and discussed the
6 questions I had regarding the potential settlement with my attorneys before signing the settlement
7 papers.

8 6. I understand that a settlement has been reached in my case and what my duties and
9 responsibilities are as a class and PAGA representative. For example, I am aware now that the
10 settlement was granted preliminary approval, the Court will likely certify a class for settlement
11 purposes, and conditionally appointed me as the representative of the class and my attorneys as
12 counsel for the class. I also understand that my duties will continue to include checking in on,
13 monitoring, and conferring with my attorneys to facilitate the notice and settlement administration
14 process, and to provide information that the Court needs in order to assess whether the settlement
15 is fair, reasonable, and adequate. Further, if any individuals who are potential class members
16 contact me, I will take steps to have them referred to the Court-appointed settlement administrator
17 so that these individuals may receive the necessary information and notice they may be eligible to
18 receive in connection with the settlement and upcoming final approval hearing.

19 7. I believe that I have done everything that my attorneys have asked of me and have
20 tried, to the best of my ability, to represent the class and pursue relief on behalf of other class
21 members and the State of California with respect to aggrieved employees. I have volunteered to
22 represent and champion the interests of many other people with similar claims and injuries because
23 of the importance of the case and the necessity that all class members and aggrieved employees
24 benefit from the lawsuit equally. I understand that as a proposed class representative, and if
25 formally appointed as a class representative, I have and continue to represent the interests of all
26 members of the class in litigation to recover relief for the class. As a non-exempt employee of
27 Defendant who was subject to the same policies, practices, and procedures as the other members of
28 the class, I have claims that are typical of those of the class. I consider the interests of the class just

as I would consider my own interests. I understand that I may need to put the interests of the class before my own interests, although I have no reason to believe that my interests are in conflict with the interests of the class. I understand that any resolution of the lawsuit is subject to court approval and must be in the best interest of the class as a whole. I have participated, and continue to participate, in the lawsuit as necessary. I have actively followed and monitored the progress of the lawsuit, and have taken steps to make sure that the litigation is prosecuted by the skilled and effective attorneys that I have retained.

8. I think my efforts helped to get the result obtained in this matter, and as a potential class and PAGA representative, I respectfully request that the Court award me an enhancement award for my efforts in pursuing and participating in this matter, as well as my broader release of claims. Taking into consideration the time that I have dedicated to this matter, I believe that this amount is reasonable.

9. I am not related to anyone associated with Lawyers *for* Justice, PC.

10. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as an enhancement award, as well as my share of the settlement as a class member and aggrieved employee.

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

Executed on 07/14/2026, at Dublin, California.

Electronically Signed 2026-07-14 16:56:00 UTC - 73.241.28.40
Nintex AssureSign® b481fe4d-a955-49e5-6399-b4860139334

Harmesh Bangar