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9 Attorneys for Plaintiff GUADALUPE LOPEZ,
10 on behalf of herself and all others similarly situated
11 and aggrieved

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **FOR THE COUNTY OF LOS ANGELES**

14 GUADALUPE LOPEZ, DA'SHON
15 SIMMONS and JESUS CRUZ, individually,
16 and on behalf of other members of the general
17 public similarly situated and aggrieved,

18 Plaintiffs,

19 v.

20 ROLLING HILLS COUNTRY CLUB, a
21 California corporation; and DOES 1 through
22 100, inclusive,

23 Defendants.

Case No. 20STCV22636

[Assigned for all purposes to the Hon. Carolyn
B. Kuhl in Dept. 12]

**DECLARATION OF PLAINTIFF
GUADALUPE LOPEZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT**

1 8. I do not recall receiving any premium pay for the full rest breaks I was not provided
2 an opportunity to take and am informed and believe that my coworkers were not provided
3 premium pay for not being provided with the opportunity to take full, uninterrupted 10-minute
4 rest periods, either.

5 9. Before and during the course of litigation, I was actively involved in assisting my
6 attorneys to support the wage and hour claims asserted. My involvement began before the initial
7 complaint was filed wherein, I provided first-hand knowledge and documentation as to
8 Defendant's practices, their ownership and corporate structure, and their wage and hour policies
9 and practices.

10 10. Part of the information I relayed was with regard to Defendant's timekeeping policies
11 and practices, and their meal and rest period policies and practices.

12 11. I provided them with all the documentation provided to me by Defendant during my
13 employment.

14 12. I assisted in reviewing time and payroll records with my attorneys, and informed
15 them of Defendant's employment policies, and whether those policies matched Defendant's
16 practices.

17 13. My attorneys called me to ask me questions over several times throughout the
18 litigation, and I contacted my attorneys several times to stay updated on the case and offer my
19 assistance on any matters I could be helpful with. I was also available for mediation by telephone,
20 during which I was available to be called to answer the questions posed by the mediator regarding
21 the asserted claims, as well as arguments raised by Defendant. In addition, I worked with my
22 attorneys over the next several weeks after mediation to understand and execute a long form
23 settlement agreement.

24 14. Over the past several months since the case has been resolved, I have stayed in
25 touch with my attorneys to ensure that there was no undue delay in payment for other class
26 members for whom I brought this Action.

27 15. I believe that, through the present, I have spent at least thirty-five (35) hours in
28 connection with this matter, which included time spent having preliminary calls with my

1 attorneys; doing an intake with my attorneys; time spent searching for documents relating to my
2 employment; time spent responding to informal and formal discovery; time spent preparing for
3 depositions and being deposed; time spent reading and understanding the Settlement Agreement;
4 time spent answering calls to discuss Defendant's timekeeping, pay, meal and rest periods, and to
5 review time and payroll records; time spent discussing with my attorneys Defendant's policies
6 and practices; time spent on-call at mediation; time spent reviewing and assisting my attorneys
7 prepare the motion for class certification; and time spent checking in on the status of the case,
8 among other things. I also spent time preparing this declaration to support Plaintiff's Motion for
9 Preliminary Approval of Class and Representative Action Settlement.

10 16. I feel that by bringing this lawsuit, I could stand up for not only my rights but the
11 rights of other employees who suffered from the same unfair wage practices. I felt that current
12 employees might not want to share their experiences with Defendant since they feared losing their
13 jobs. This is certainly understandable as I, too, have to provide for myself and others.

14 17. By bringing this lawsuit, I have put the interests of the class ahead of my own.

15 18. I understood that I could possibly earn a small enhancement if this case is resolved
16 favorably. I also knew that I could face retaliation from Defendant and backlash from former
17 coworkers who are loyal to Defendant.

18 19. I also had to provide a general release of claims and a waiver of rights under
19 California Civil Code section 1542 to Defendant as part of the settlement.

20 20. I understand that if I had brought this case individually, I may have earned more
21 compensation individually and on a much quicker timeline than the timeline it took to resolve this
22 Action.

23 21. I understood the substantial risks involved in serving as the Class Representative
24 and undertook these risks knowing there was no certainty regarding the outcome of the case.

25 22. My goal in bringing this lawsuit was to obtain a recovery on behalf of the class,
26 and, even more importantly, to put an end to what I believe are illegal practices on the part of
27 Defendant. I believe I have achieved both through this lawsuit and settlement.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct this 2 day of September 2026, at Long Beach, California.



GUADALUPE LOPEZ