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Attorneys for Plaintiff EUGENIA CALVA DE GARCIA

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SUPERIOR COURT OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

EUGENIA CALVA DE GARCIA, on
behalf of herself, the State of California,
and others similarly situated and aggrieved
and MILIPZA ANDRADE HERNÁNDEZ,
in a Representative capacity only and on
behalf of other members of the general
public similarly situated,

Plaintiffs,

v.

GNIMGT, INC., a California corporation;
GOOD NITE INN SYLMAR, INC., a
California corporation; PHILLIP HO, an
individual, and NICHOLAS HO, an
individual, and DOES 1-100, inclusive,

Defendants.

Case No. 22STCV03262

Assigned to the Hon. Bradley S. Phillips

DECLARATION OF EUGENIA CALVA DE GARCIA

Complaint Filed: January 27, 2022
Trial Date: None Set

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1 I, EUGENIA CALVA DE GARCIA, declare as follows:

2 1. I am an adult over the age of eighteen (18) years old. I am a plaintiff in the above-
3 captioned lawsuit. I have personal knowledge of the facts set forth in this declaration. I make this
4 declaration in support of Plaintiffs' Motion for Court Approval of PAGA Settlement.

5 2. I worked for Defendant GNIMGT, Inc. ("Defendant") as a housekeeper from
6 approximately June 2010 until approximately December 2020 in Sylmar, California. While I
7 worked there, I do not think I was paid for all the hours I worked because my time punches were
8 rounded so that I lost a few minutes of compensable time on many of my shifts. I also do not
9 believe that I and other employees received proper meal periods because we had to be back at our
10 workstations at exactly 30 minutes after clocking out for lunch, or we could be subject to
11 discipline. To avoid this, we had to cut our lunches short by at least five minutes to walk back to
12 the clock-in station and wait by the clock in order to clock back in 30 minutes. I also had to
13 respond to calls from co-workers and supervisors during my rest breaks.

14 3. I decided to file this lawsuit because I did not feel that I was treated fairly as an
15 employee of Defendant with regard to not being paid correctly and getting all of my lunches and
16 rest breaks like I was supposed to.

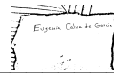
17 4. It is my understanding this lawsuit could not have been prosecuted or settled on
18 behalf of the other employees unless I or some other current or former employee decided to serve
19 as a named plaintiff and proposed PAGA representative. In deciding to serve as a named plaintiff
20 in this case, I understood that my name could be publicly attached to this lawsuit and that my
21 work experiences to some extent would be set forth in a public court file. I recognized I would
22 need to devote a certain amount of time that I could have spent otherwise. I also recognized my
23 bringing the lawsuit carried some degree of risk for Defendant's legal costs among other things.
24 Despite this, I decided to serve as the named plaintiff and PAGA representative without any
25 promise of recovery or compensation.

26 5. I am familiar with the work involved in prosecuting this case. I have participated
27 in meetings, phone calls, and other communications with my lawyers regarding this case. I am
28 familiar with the allegations and defenses of the claims in this case. I am familiar with the major

1 events in this case, including the investigation performed by my lawyers, the mediation with
2 Defendant that eventually resulted in this settlement, and the preparation of settlement papers and
3 the need to obtain court approval of the proposed settlement. I participated in the litigation and
4 provided my lawyers with information and documents regarding my employment with Defendant.

5 6. I believe that the proposed settlement obtained on behalf of the State and other
6 aggrieved employees is excellent in view of the issues and risks involved with the case.

7 I declare under penalty of perjury under the laws of California that the foregoing is true
8 and correct. Executed on 04 / 24 / 2025, at Sylmar, California.

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