

Eric K. Yaeckel [CSB No. 274608]
yaeckel@sullivanlawgroupapc.com
Ryan T. Kuhn [CSB No. 324538]
Ryan@sullivanlawgroupapc.com
SULLIVAN & YAECKEL LAW GROUP, APC
2330 Third Avenue
San Diego, California 92101
(619) 702-6760 * (619) 702-6761 FAX

Attorneys for Plaintiff MILIPZA ANDRADE HERNANDEZ

[Additional counsel listed on next page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
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
HERNANDEZ, 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 PLAINTIFF MILIPZA
ANDRADE HERNANDEZ IN SUPPORT OF
THE MOTION FOR COURT APPROVAL OF
THE PARTIES' PAGA SETTLEMENT**

Date: August 7, 2025
Time: 8:30 a.m.
Dept.: 26

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

JAMIE K. SERB, ESQ. (SBN 289601)
jamie@crosnerlegal.com
NIKKI TRENNER, ESQ (SBN 316007)
nikki@crosnerlegal.com
ZACHARY M. CROSNER (SBN 272295)
zach@crosnerlegal.com
CROSNER LEGAL, PC
9440 Santa Monica Blvd. Suite 301
Beverly Hills, CA 90210
Tel: (866) 276-7637
Fax: (310) 510-6429

Attorneys for Plaintiff EUGENIA CALVA DE GARCIA

Raul Perez (SBN 174687)
Raul.Perez@capstonelawyers.com
Orlando Villalba (SBN 232165)
Orlando.Villalba@capstonelawyers.com
Helga Hakimi (SBN 257381)
Helga.Hakimi@capstonelawyers.com
CAPSTONE LAW, APC
1875 Century Park East, Suite 1000
Los Angeles, California 90067
310.556.4811 Main | 310.943.0396 Fax

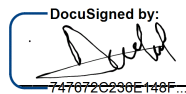
Attorneys for Plaintiff MILIPZA ANDRADE HERNANDEZ

I, Milipza Andrade Hernandez, declare as follows:

1. I am a named Plaintiff in this matter. I have filed these claims in a Representative Capacity, and on behalf of other members of the public similarly situated.
2. I make this declaration in support of Plaintiffs' Motion for Court Approval of the Parties' Paga Settlement. I am personally familiar with the facts set forth in this declaration and, if called to testify, could and would do so.
3. To my recollection, I personally met with my Attorneys on at least 3 occasions. Several of those meetings lasted in excess of 2 hours.
4. During these meetings, I would review and explain numerous documents turned over by Defendants from my employment. I would also explain my (as well as others') role during work. I also helped identify numerous other employees who could support the claims I was making in this lawsuit. I contacted many of these individuals myself to verify their willingness to participate.
5. I also spoke with my attorneys on the phone on at least 12 other occasions.
6. In total, I estimate that I spent at least 25 hours related to the above mentioned tasks directly working with my attorneys. I also spent at least another 3-4 hours of my own time gathering evidence and outlining issues that I later shared with my attorneys.
7. When I decided to move forward with this case, I was counseled by my attorneys of the potential stigma of being a Representative in a "Wage and Hour," dispute, as this is a publicly filed lawsuit.
8. I was also advised when I brought this case that had we lost, I could have been personally liable for paying all of Defendants' costs. I was further advised this could be well into the tens of thousands of dollars on this type of case.
9. Despite these risks I was committed to achieving a settlement that would benefit all employees who worked at the Good Nite Inn hotel locations.

1 I certify that the above was accurately translated to me by a staff member of my attorneys' office
2 who is competent in both English and Spanish.

3
4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct. Executed this 5/9/2025 day of May, 2025 at Santa Rosa, California.

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9 Milipza Andrade Hernandez
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