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Attorneys for Plaintiff ELVA FLORES, in a Representative capacity only, and on behalf of other members of the general public similarly situated

[Additional Counsel listed on next page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

ELVA FLORES and MEGAN DREMIN, in a Representative capacity only, and on behalf of other members of the general public similarly situated

Plaintiff

v.

RANCHO VALENCIA RESORT PARTNERS, LLC., a California Limited Liability Company, and RVR RANCHO VALENCIA HOLDINGS PARTNERS, L.P., and DOES 1-10, inclusive

Defendants

CASE NO. 37-2022-00006752-CU-OE-CTL

DECLARATION OF ELVA FLORES IN SUPPORT OF PLAINTIFF'S UNOPPOSED EX PARTE APPLICATION FOR PAGA SETTLEMENT APPROVAL

Date: October 23, 2025

Time: 8:30 a.m.

Dept.: C-68

Judge: Hon. Richard S. Whitney

Arby Aiwazian [CSB No. 269827]

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Joanna Ghosh [CSB No. 272479]

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LAWYERS FOR JUSTICE

450 North Brand Blvd., Suite 900

Glendale, California 91203

Attorneys for MEGAN DREMIN, in a Representative capacity only, and on behalf of other members of the general public similarly situated

1 I, ELVA FLORES, hereby declare as follows:

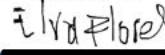
- 2 1. I am the named Plaintiff in the above-captioned matter. I make this declaration in support of
3 Plaintiff's Unopposed *Ex Parte* Application for Approval of PAGA Settlement.
- 4 2. I am personally familiar with the facts set forth in this declaration, and if called to testify as a
5 witness I could and would do so.
- 6 3. To my recollection, I personally met with my Attorneys on at least 5 occasions. Several of
7 those meetings lasted in excess of 1 hours.
- 8 4. During these meetings, I would review and explain numerous documents turned over by
9 Defendants from my employment. I would also explain my (as well as others') role during
10 work. I also helped identify numerous other employees who could support the claims I was
11 making in this lawsuit. I contacted many of these individuals myself to verify their willingness
12 to participate.
- 13 5. I also spoke with my attorneys on the phone on at least 14 other occasions.
- 14 6. I also spent significant time reviewing the settlement documentation and discussing the
15 settlement with my attorneys.
- 16 7. In total, I estimate that I spent at least 25 hours related to the above mentioned tasks directly
17 working with my attorneys. I also spent at least another 6-8 hours of my own time gathering
18 evidence and outlining issues that I later shared with my attorneys.
- 19 8. When I decided to move forward with this case, I was counseled by my attorneys of the
20 potential stigma of being a Class Representative in a representative action, as this is a publicly
21 filed lawsuit.
- 22 9. I was also advised when I brought this case that had we lost, I could have been personally
23 liable for paying all of Defendants' costs. I was further advised this could be well into the tens
24 of thousands of dollars on this type of case.

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1 10. Despite these risks I was committed to achieving a settlement that would benefit all employees
2 working for Defendants.

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4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and correct. Executed this 21st day of October, 2025 at San Diego, California.

6 DocuSigned by:

7 
[REDACTED]

8 ELVA FLORES
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