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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

Case No. 37-2022-0006752-CU-OE-CTL

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

Plaintiffs

vs.

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

Defendants.

Honorable Richard S. Whitney
Department C-68

**DECLARATION OF PLAINTIFF MEGAN
DREMIN IN SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR PAGA
SETTLEMENT APPROVAL**

Date: October 23, 2025
Time: 8:30 a.m.
Department: C-68

DECLARATION OF MEGAN DREMIN

I, **Megan Dremín**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am one of the named plaintiffs in the above-captioned case and the named plaintiff in the related case entitled *Megan Dremín v. Rancho Valencia Resort Partners, LLC, et al.*, San Diego Superior Court Case No. 25CU043100C, which was consolidated with the above-captioned case through an amended complaint. 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 Rancho Valencia Resort Partners, LLC (“Defendant”) in March 2025 as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers for Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant was held accountable for not properly compensating their 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, representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff and a PAGA representative. Prior to commencing my case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff and PAGA representative.

3. Throughout my case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, answering questions, and providing guidance regarding the duties of other non-exempt employees. 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. Throughout 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 many documents as I could. I spent time speaking with my attorneys about the case, identifying potential witnesses,
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1 providing my attorneys with documents and information concerning the case, and also describing
2 policies, practices, and procedures of Defendant.

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

7 6. I believe that I have done everything that my attorneys have asked of me and have
8 tried, to the best of my ability, to seek relief for the aggrieved employees and the State of
9 California. I think my efforts helped to get the result obtained in this matter.

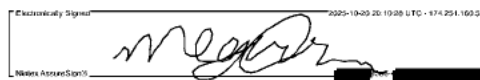
10 7. For my broader individual waiver and release of claims with a California Civil Code
11 Section 1542 waiver (set forth in Section 5.1 of the Settlement Agreement), the Settlement
12 provides for a general release payment in the amount of \$10,000.00, to be paid out of the Gross
13 Settlement Amount, subject to Court approval. I respectfully request that the Court award me full
14 payment of the general release payment.

15 8. I am not related to anyone associated with Lawyers for Justice, PC or Sullivan &
16 Yaeckel Law Group APC.

17 9. I have not entered into any undisclosed agreements, nor have I received any
18 undisclosed compensation in this matter. The only compensation I will receive is whatever amount
19 the Court awards as a general release payment, as well as my share of the settlement as an
20 aggrieved employee.

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

23 Executed on 10/20/2025, at Escondido, California

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25  2025-10-20 20:19:09 UTC - 874.251.160.237
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27 Megan Dremine
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