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Attorneys for Plaintiff Guadalupe Lopez Medina,
individually, and on behalf of all other similarly situated employees

SUPERIOR COURT OF STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

GUADALUPE LOPEZ MEDINA, as an
individual and on behalf of other similarly
situated employees,

Plaintiff,

vs.

ATRIUM HOSPITALITY LP, a California
corporation, ATRIUM HOTELS
MANAGEMENT, LLC, a California
corporation, and DOES 1-50, inclusive,

Defendants.

Case No.: 30-2022-01245971-CU-OE-CXC

*Assigned for all purposes to the
Hon. Layne H. Melzer, Dept. CX102*

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

Hearing Date: June 26, 2025

Hearing Time: 2:00 p.m.

Department: CX104

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1. I am over the age of eighteen and have personal knowledge of everything stated below and could competently testify to these facts if sworn.
2. I submit this Declaration in support of the motion for preliminary approval of class action settlement and class representative enhancement fee.
3. I worked for Defendants. As I worked for Defendants as an hourly worker during the class period, I worked very hard, especially when I worked above five and six hours and not able to take all of my entitled meal breaks and rest breaks and worked without receiving all wages I was entitled to. After my employment ended with Defendant, I determined that I would attempt to effectuate a change in Defendant's practices and policies through a wage and hour class action and representative action under the Private Attorney General Act and class action.
4. After consulting with a law firm, I decided to file a class action and Private Attorney General Action claim and class action against Defendants. I would consider myself a low wage hourly worker but despite this I still decided to take the risk of filing this class action and losing this case that could have exposed myself to certain attorneys' fees and costs incurred by Defendant. However, my passion to vindicate the rights of my coworkers outweighed the risk exposure to myself as I believed that my co-workers deserved to be treated fairly in the eyes of the law.
5. Throughout this case, I was required to appear at my attorneys' office, answering questions during several interviews by my attorney and the staff either in person or via telephone related to the case, and locating and submitting documents to my attorney in support of the claims.
6. I remained involved and provided information and details about Defendants' practices and policies in support of the class claims so that the claims could be maximized for the class members. Through the litigation I made myself available to complete the settlement agreement and finalize the terms of the settlement agreement and execute the settlement agreement.
7. In this litigation, I was committed throughout the entire process to ensure that the class members were treated fairly and committed approximately 45 hours to this case.
8. I am not aware of any claim I am making in this case that only applies to me and not

1 my fellow Class Members. Nor do I believe I have any interest in the outcome of this case that is in
2 conflict with the interests of the rest of the Class Members. As part of fulfilling my duties as a class
3 representative for this lawsuit, I made and performed the following duties. (1) I represented the
4 interest of all class members; (2) I always considered the interest of the Class just as I would consider
5 my own interests and put the interests of the Class before my own interests; (3) I served as one of
6 the fiduciaries of the Class; (4) I actively participated in the lawsuit by searching for documents,
7 keeping in contact with my attorneys, and answering their questions as needed; and (5) I followed
8 the progress of the lawsuit and provided all relevant information to my attorneys.

9 9. To achieve this settlement, I believe I have done everything my attorneys have asked
10 of me, and have given my best efforts to represent the Class Members. Throughout the course of
11 this litigation, I participated in every step of the litigation from the case initiation, the filing of the
12 amended complaints, the mediation, the settlement agreement review and execution as well as the
13 approval process

14
15 I declare under the penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct. Executed on this __th day of April 2025 in Irvine, California.

17
18
19 _____
Guadalupe Lopez Medina, Declarant

