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Attorneys for Plaintiff and the Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF INYO**

STEVEN WILLIAMS, as an individual and  
on behalf of all others similarly situated,

Plaintiff,

vs.

XANTERRA PARKS & RESORTS, INC.,  
a Delaware corporation, doing business as  
The Oasis at Death Valley; and DOES 1  
through 50, inclusive,

Defendants.

Case No.: ICSI-CVCV-2022-67661

**DECLARATION OF STEVEN WILLIAMS IN  
SUPPORT OF PLAINTIFF’S MOTION TO  
APPROVE SETTLEMENT AGREEMENT  
PURSUANT TO THE PRIVATE ATTORNEYS  
GENERAL ACT OF 2004**

Date: September 20, 2024

Time: 9:00 a.m.

Dept.: 1

Complaint Filed: February 17, 2022

Trial Date: None Set

**DECLARATION OF STEVEN WILLIAMS**

I, Steven Williams, declare as follows:

1. I am an individual over the age of 18. I am the named Plaintiff in the above-referenced action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I worked for Defendant Xanterra Parks & Resorts, Inc. (“Defendant”) as a Food and Beverage Manager from about April 2019, until about November 13, 2021. Throughout my employment with Defendant, I worked as an hourly, non-exempt employee.

3. During my employment, I regularly worked overtime and received overtime pay. Whenever I was paid overtime, the wage statements I received did not list the applicable rate of pay for overtime wages. Instead, my wage statements listed a base rate and a separate line item showing half of the base rate. The wage statements also did not list the correct total number of hours worked during the pay period.

4. During my employment, I was also regularly required to use my personal cell phone for work purposes. Defendant did not reimburse me for the costs of using my personal cell phone.

5. I understand that the claims alleged in this action were brought on behalf of other aggrieved employees. I do not believe I have any interests that are adverse to the other employees that are part of the PAGA settlement.

6. I have spent a significant amount of time discussing this matter with my attorneys on many occasions and explaining my understanding of Defendant’s practices. To date, I have performed a number of tasks in my role as a representative, including:

- a. Discussing the case and the facts involved with my attorneys on several occasions, including telephonic discussions at various stages of the lawsuit;
- b. Gathering documents related to the case;
- c. Reviewing and submitting my PAGA Notice to the Labor and Workforce Development Agency (“LWDA”);
- d. Responding to many calls from my attorneys’ regarding the information

needed to successfully prosecute the case;

e. Participating in settlement discuss; and

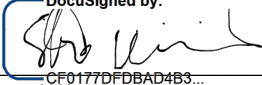
f. Reviewing pleadings in this case, including the complaints, the Settlement Agreement, and my declaration.

7. I have also entered into a general release of all known and unknown claims against Defendant in entering into this settlement and agreed to waive the protections of Civil Code § 1542.

8. I have reviewed the Private Attorneys General Act Settlement Agreement and Release (“Settlement Agreement”) and I believe that the settlement is in the best interest of all aggrieved employees who are part of the settlement. I believe the settlement to be reasonable and fair, and adequately compensates the aggrieved employees who are part of the settlement for the claims alleged in the complaint.

9. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive accomplishment and understand that other people will benefit because of the actions that I have taken.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 8/12/2024, 2024, at \_\_\_\_\_, City \_\_\_\_\_, California.

DocuSigned by:  
  
CF0177DFDBAD4B3...  
Steven Williams