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**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

MAURICIO VIDES, on behalf of the State of
California, as a private attorney general,

Plaintiff,

vs.

FLIGHTS RESTAURANT GROUP, INC., a
Corporation; FLIGHTS RESTAURANT
BURLINGAME, INC., a Corporation;
FLIGHTS RESTAURANT CAMPBELL,
INC., a Corporation; FLIGHTS
RESTAURANT LOS GATOS, INC., a
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 22CV402958

**DECLARATION OF MAURICIO VIDES
IN SUPPORT OF MOTION TO
APPROVE PAGA SETTLEMENT**

Hearing Date: July 3, 2024
Hearing Time: 1:30 p.m.

Judge: Hon. Theodore C. Zayner
Dept.: 19

Action Filed: September 9, 2022
Trial Date: None Set

1 I, Mauricio Vides, declare:

2 1. I am a competent adult, I have personal knowledge of the facts in this declaration, and I
3 am making this declaration on behalf of myself, as a named plaintiff, and in support of the Motion to
4 Approve Private Attorneys General Act Settlement.

5 2. I worked in California as a non-exempt employee of the Flights Restaurant Group
6 defendants ("Defendants") from approximately May of 2021 to July 15, 2021.

7 3. I retained my attorneys who are experienced in PAGA representative action litigation
8 and claims against employers for violations of the California Labor Code. I have no personal
9 relationship or family ties to my attorneys or any officer of the Court. I am not aware of having any
10 actual or potential conflicts of interest with another Aggrieved Employee in this case nor am I aware of
11 having any actual or potential conflicts of interest with ILYM Group Inc., the settlement administrator.

12 4. I was subject to Defendants' policies and practices that have been alleged as unlawful in
13 the Complaint and the PAGA notice sent to the Labor and Workforce Development Agency. For
14 example, Defendants deprived me of compliant meal and rest breaks on a regular basis and when these
15 violations occurred I didn't receive all the premium payments I was entitled to. In addition, I was
16 required to work off the clock in the form of a very strict donning and doffing policy that included
17 detailed grooming requirements and dressing into the company provided uniform. Only after all of
18 Defendants' strict requirements were met could I make my way to the point of sale machine to clock in.
19 Defendants also contacted me while off the clock to coordinate scheduling changes and assignments
20 while at the same time failing to pay for this off the clock time and also not reimbursing me for the
21 expenses I incurred on my personal cell phone for work-related issues.

22
23 5. In bringing this case for myself, the State of California, and the other employees, I
24 understood a lot of work would be required and I was willing to, and did, do the work to keep the case
25 moving forward. For instance, before the complaint was filed I spoke to my attorneys several times and
26 discussed how Defendants implemented their company policies and procedures. I also assisted my
27 attorneys in their investigation into my claims by providing them documents and answering their
28

1 questions. I reviewed the complaint before it was filed and after it was filed I was given access to an
2 electronic file sharing program that alerted me via email when important documents were filed so that I
3 could review them and keep up with the developments in the case. I was informed that the Defendants had
4 the right to take my deposition, and that the preparation and deposition itself could take multiple days.
5 Although my deposition was not taken, I feel I would have been adequately prepared and comfortable to
6 give testimony on my experiences.
7

8 6. My attorneys explained to me the risks and benefits of bringing a representative action.
9 I understood that I took on the risk, both professionally and financially, in pursuing the case as a
10 representative PAGA action.
11

12 7. A mediation took place on September 19, 2023 with Hon. Brian C. Walsh (Ret.), a former
13 judge and a well-respected and experienced mediator. The mediation resulted in an agreement to settle
14 the action. I communicated with my attorneys regarding the terms of the settlement which was reached
15 between the parties and understood that the recovery in this case was for the benefit of my fellow
16 coworkers, not just for me, and therefore wanted the best possible result to be obtained for the Aggrieved
17 Employees.
18

19 8. I have been actively involved with this lawsuit. Although I did not keep time records, I
20 was in regular contact with my attorneys, reviewed court filings, and spent a significant amount of time
21 on the issues presented during the lawsuit and in the settlement process. I estimate that I spent
22 approximately 30-40 hours working on this case up until this point.
23

24 9. I reviewed the final PAGA Settlement Agreement and I believe it is fair and reasonable
25 given the facts of the case.

26 10. As part of the settlement it was necessary for me to sign a general release of all claims I
27 may have against the Defendants. I believe the Service Award I have requested provides me with some
28 compensation for this agreed release and is also fair compensation for the service I performed and

1 the risks I undertook.

2
3 Executed on Mar 29, 2024, at San Jose, California.
4 (city, state)

5 
6 Mauricio Vides (Mar 29, 2024 17:10 PDT)
7 Mauricio Vides