

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)
Sydney Castillo Johnson (State Bar #343881)
John L. Nitti (State Bar #330752)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 599-8292
jlapuyade@jcl-lawfirm.com
scastillo@jcl-lawfirm.com
jnitti@jcl-lawfirm.com

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)
Nicole Noursamadi (State Bar #357246)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047
shani@zakaylaw.com
nicole@zakaylaw.com

SULLIVAN & YAECKEL LAW GROUP, APC

Eric K. Yaeckel (State Bar # 274608)
Ryan T. Kuhn (State Bar # 324538)
2330 Third Avenue
San Diego, CA 92101
Telephone: (619) 702-6760
Facsimile: (619) 702-6761
yaeckel@sullivanlawgroupapc.com
ryan@sullivanlawgroupapc.com

Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

MICHAEL MCGEE, WAEL KANAFANI,
DAVID URIBE, ZACHARY MCGORDON,
KATIE ROSAS, TERESA RAU, and
IMMANUEL PASCUAL, individuals, on
behalf of themselves, and on behalf of all
persons similarly situated,

Plaintiffs,

v.

MITRA VI, LLC, an Arizona limited liability

Case No: 37-2022-00044660-CU-OE-CTL

**DECLARATION OF KATIE ROSAS IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: January 30, 2026
Time: 9:30 a.m.

Judge: Hon. Gregory W. Pollack
Dept.: C-71

company; DENALI MIDCO 2 LLC, a
Delaware limited liability company; and DOES
1-50, Inclusive,
Defendants.

1 I, KATIE ROSAS, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am a lead named Plaintiff in the
4 above wage and hour class action filed against Defendant MITRA VI, LLC, an Arizona limited liability
5 company, and Defendant DENALI MIDCO 2 LLC, a Delaware limited liability company (hereinafter
6 “Defendants”).

7 2. This declaration is being submitted in support of Plaintiffs’ motion for Final
8 Approval of Class Action and PAGA Settlement.

9 3. I believe that I am, have been, and will continue to represent the interests of the class
10 fairly and adequately. I have claims that are typical of the claims of the Class Members that I am
11 seeking to represent.

12 4. I was employed by Defendants from March 2021, to July 2022, as a Car Wash Associate
13 and was at all times classified by Defendants as a non-exempt employee, paid on an hourly basis, and
14 entitled to legally compliant meal and rest periods, and minimum, regular and overtime wages for all
15 hours worked. I understand that I am seeking to represent all current and former California employees
16 of Defendants classified as non-exempt during the period beginning November 4, 2018, through
17 February 13, 2025 (the “Non-Exempt Employee Subclass”).

18 5. Generally, my lawsuit claims that Defendants failed to provide compliant meal and rest
19 periods, failed to pay for all time worked, failed to pay overtime, meal period premiums, and sick pay
20 at the correct regular rate of pay, failed to furnish accurate itemized wage statements, failed to
21 reimburse for mandatory business expenses, failed to timely pay all wages during employment, failed
22 to pay all wages upon separation, and misclassified certain Site Manager employees as exempt
23 employees.

24 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
25 to represent because I was subject to the same alleged unlawful employment policies and practices at
26 issue in this action, including but not limited to, Defendant’s failure to provide compliant meal and
27 rest periods, failed to pay for all time worked, failed to pay overtime, meal period premiums, and sick
28 pay at the correct regular rate of pay, failed to furnish accurate itemized wage statements, failed to

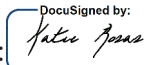
1 reimburse for mandatory business expenses, and failed to timely pay all wages during employment.
2 Factually, Defendants' policies and practices apply class wide, and Defendants' liability can be
3 determined by facts common to all members of the Class.

4 7. Further, there is no conflict between my interests and the interests of the class that I am
5 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that
6 I was injured by the same company-wide policies and practices to which the proposed Class was
7 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
8 of the Class by initiating this litigation, undertaking extensive class discovery, and evaluating the
9 proposed settlement to assure that it is fair.

10 8. I understood that at the time I filed this action, as a Class Representative, I owed a duty
11 to the putative class members to faithfully prosecute this action with their best interests at the forefront
12 of every decision. I understood that I could not make any decision in this action for the sole benefit
13 of my personal interest. I understood that in executing this duty, I might have been asked to sacrifice
14 my personal best interests for the benefit of the interests of the putative class members. Nevertheless,
15 I knowingly and voluntarily undertook this duty in order to provide the broadest possible relief for my
16 current and former co-workers for what I perceived to be Defendants' unlawful wage and hour
17 practices. I believe that I faithfully executed the duties of a Class Representative throughout this
18 litigation and will continue to do until this litigation is fully and finally resolved.

19 9. I believe that the proposed settlement before the Court is fair, reasonable, and adequate,
20 and made in the best interest of the Participating Class Members. Consequently, I respectfully, and
21 humbly, ask the Court to grant preliminary approval of the Settlement and all of its terms.

22
23 I declare under the penalty of perjury under the laws of the State of California that the foregoing
24 is true and correct. Executed on 8/21/2025, at San Diego, California.

25
26 By: 
27 KATIE ROSAS
28