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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 THERESA RAU 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.

I, TERESA RAU, declare as follows:

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

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

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

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

5. Generally, my lawsuit claims that Defendants failed to provide compliant meal and rest periods, failed to pay for all time worked, failed to pay overtime, meal period premiums, and sick pay

1 at the correct regular rate of pay, failed to furnish accurate itemized wage statements, failed to
2 reimburse for mandatory business expenses, failed to timely pay all wages during employment, failed
3 to pay all wages upon separation, and misclassified certain Site Manager employees as exempt
4 employees.

5 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
6 to represent because I was subject to the same alleged unlawful employment policies and practices at
7 issue in this action, including but not limited to, Defendant's failure to provide compliant meal and
8 rest periods, failed to pay for all time worked, failed to pay overtime, meal period premiums, and sick
9 pay at the correct regular rate of pay, failed to furnish accurate itemized wage statements, failed to
10 reimburse for mandatory business expenses, and failed to timely pay all wages during employment.
11 Factually, Defendants' policies and practices apply class wide, and Defendants' liability can be
12 determined by facts common to all members of the Class.

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

19 8. I understood that at the time I filed this action, as a Class Representative, I owed a duty
20 to the putative class members to faithfully prosecute this action with their best interests at the forefront
21 of every decision. I understood that I could not make any decision in this action for the sole benefit
22 of my personal interest. I understood that in executing this duty, I might have been asked to sacrifice
23 my personal best interests for the benefit of the interests of the putative class members. Nevertheless,
24 I knowingly and voluntarily undertook this duty in order to provide the broadest possible relief for my
25 current and former co-workers for what I perceived to be Defendants' unlawful wage and hour
26 practices. I believe that I faithfully executed the duties of a Class Representative throughout this
27 litigation and will continue to do until this litigation is fully and finally resolved.
28

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

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 8/20/2025, at San Diego, California.

DocuSigned by:
By: TERESA RAU
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TERESA RAU