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Attorneys for Plaintiffs DARCEL CELESTE NAVARRETTE and ELIZABETH QUIROGA
CARRERO and Class Members

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

DARCEL CELESTE NAVARRETTE and
ELIZABETH QUIROGA CARRERO,
individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

INTERSTATE MANAGEMENT
COMPANY, LLC dba LA QUINTA INN &
SUITES BY WYNDHAM MADERA, a
Delaware Limited Liability Company;
AIMBRIDGE HOSPITALITY, LLC, a
Delaware Limited Liability Company; and
DOES 1-50, inclusive,

Defendants

CASE NO.: MCV087491

[Assigned for all purposes to Hon. Eric J. LiCalsi;
Dept.44]

**DECLARATION OF PLAINTIFF DARCEL
CELESTE NAVARRETTE IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: November 18, 2025
Time: 8:30 a.m.
Dept.: 44

Complaint Filed: August 12, 2022

1 I, DARCEL CELESTE NAVARRETTE hereby declare as follows:

2 1. I am over the age of eighteen and I submit this Declaration in support of
3 the Plaintiffs' Motion for Final Approval of Class and PAGA Action Settlement. The following is
4 based upon my personal knowledge and if called as a witness, I could and would competently
5 testify thereto.

6 2. I was employed by Defendant Interstate Management Company, LLC
7 ("Defendant") in approximately August 2020 through my separation in August 2021 as a non-
8 exempt employee with the position of Front Desk Agent. My duties included but were not limited
9 checking in guests, filing, and handling phone calls and reservations.

10 3. As a non-exempt employee, I suffered the same damages as other
11 employees. These included not being paid all my wages including overtime, not provided meal
12 and rest periods, not provided accurate wage statements, and not timely paid wages during
13 employment and upon my separation from Defendant's employ, not reimbursed for business
14 expenses incurred, all in accordance with California law. As a result of these alleged violations, I
15 sought consultation with my attorneys at James Hawkins, APLC.

16 4. Based upon my allegations, and after consultation and full disclosure from
17 my attorneys about the potential risks I faced as a Plaintiff in a putative class action, I freely
18 decided to pursue this lawsuit to try and vindicate my rights and the rights of others who also
19 worked for Defendant and suffered similar harms due to Defendant's common practices and
20 policies.

21 5. Prior to filing my action, my attorneys and I had multiple conferences
22 about the factual bases for the claims that I wanted to pursue against Defendant. During those
23 conferences, my attorneys provided me with an overview of how those claims would be litigated
24 and generally educated me about the nature of complex/representative litigation and my role as the
25 representative Plaintiff.

26 6. My attorneys provided me with a draft of the complaint for my review and
27 approval. I closely reviewed the complaint to ensure accuracy and completeness. As a
28

1 result, I caused my attorneys to file the class action complaint alleging claims for the allegations
2 alleged therein. Thereafter, I have been fully involved in my case. Following the filing of the
3 complaint, I collaborated with my attorneys on the prosecution of my claims, and I regularly
4 contacted my attorneys to stay current on the status of the litigation, and to discuss my attorneys'
5 progress in prosecuting the claims.

6 7. Since I believe I was not paid my wages, not timely paid wages, not provided meal
7 and rest periods, not reimbursed business expenses, and not provided accurate itemized wage
8 statements, I believe that I have been similarly injured as to all other class members in the
9 settlement who worked for Defendant during the class period. I believe the claims asserted in the
10 Complaint are also shared by the other Class Members. I worked with various other non-exempt
11 employees, and I believe we were all treated the same and subject to the same unlawful policies.

12 8. On August 12, 2022, I, through my attorneys, filed this instant putative class action
13 against Defendant.

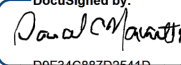
14 9. Since I agreed to become a Class Representative, I have worked every step of the
15 way with my attorneys. During the course of the litigation I have always kept the best interest of
16 the Class Members on equal footing as mine. I have been, and I am willing to continue to pursue
17 the Class Members' claims vigorously on our collective behalf if the Settlement is not finally
18 approved. As a result, I firmly believe that I do not have any interests adverse to the interests of
19 the Class Members. I have maintained the Class Members best interest from the inception of the
20 case.

21 10. As a Class Representative, I have spent numerous hours consulting with my
22 attorneys, providing documentation, consulting with other Class Members, responding to
23 questions by my attorneys, providing documents to my attorneys, working with my attorneys to
24 review documents received, preparing written discovery, preparing for my deposition although it
25 was not taken as a result of the settlement reached. I also assisted my attorneys in preparing for the
26 mediation and attending the mediation via telephone. I was consulted about the status of the case
27 and provided constant feedback about the case from my attorneys including the mediation,
28 settlement negotiations and eventual settlement. I estimate I have spent approximately 40-45

hours working on this case.

11. From the beginning of this case, I have freely chosen to accept the risks of being a Class Representative in this class action lawsuit. Although I have not realized any of the risks, I freely chose to assume the risks of filing a class action lawsuit and the stigma that is associated with it, to pursue the claims on behalf of the Class Members as I wanted to vindicate their rights. I believe we have achieved that result with the settlement and the individual payments to the Class Members. I believe the settlement is fair reasonable and adequate based on the numerous defenses asserted by Defendant. I believe the efforts and work I put forth helped to achieve the fair settlement that will benefit the Class Members. As a result of my efforts, I also believe the Class Representative Service Award is reasonable, and I respectfully request the Court approve the amount of \$10,000.00 to each Class Representative as fair and reasonable.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct. Executed on October 20, 2025, at Madera, California.

DocuSigned by:

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DARCEL CELESTE NAVARRETTE