

SOLOUKI I SAVOY, LLP
Grant Joseph Savoy, Esq.(SBN: 284077)
grant@soloukisavoy.com
Shoham J. Solouki, Esq.(SBN: 278538)
shoham@soloukisavoy.com
316 W. 2nd Street, Suite 1200
Los Angeles, California 90012
Telephone: (213)814-4940
Facsimile: (213)814-2550

JAMES HAWKINS APLC
James R. Hawkins, Esq. (#192925)
Gregory Mauro, Esq. (#222239)
Michael Calvo, Esq. (#314986)
9880 Research Drive, Suite 200
Irvine, CA 92618
Tel.:(949) 387-7200
Fax:(949) 387-6697
Email: James@jameshawkinsaplc.com
Email: Greg@jameshawkinsaplc.com
Email: Michael@jameshawkinsaplc.com

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,

Plaintiff,

v.

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]

CLASS ACTION

**DECLARATION OF ELIZABETH
QUIROGA CARRERO IN SUPPORT OF
PLAINTIFFS' 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 **DECLARATION OF ELIZABETH QUIROGA CARRERO**

2 I, e, hereby declare as follows:

3 1. I am an individual over the age of 18 and am a named plaintiff in this matter.
4 This declaration is submitted in support of approval of the proposed class action settlement
5 reached in this case. I have personal knowledge of the facts stated in this declaration and could
6 testify competently to them if called upon to do so.

7 2. I submit this declaration in support of Plaintiffs' Motion for Final
8 Approval of Class Action Settlement.

9 3. I was employed by Defendant INTERSTATE MANAGEMENT COMPANY,
10 LLC ("Defendant") during the class period as a non-exempt hourly employee.

11 4. Through my attorneys, I initiated this lawsuit, which was filed on behalf of
12 myself and other non-exempt employees. The purpose of the lawsuit was to recover wages and
13 penalties.

14 **Serving the Class**

15 5. I understand that I am serving as a class representative in this lawsuit and that I
16 have an obligation to do what is best for the class members as a whole, not just what is best for
17 me. I totally accept this great responsibility.

18 **Services Performed and Time Estimates**

19 6. I have been actively throughout this entire lawsuit. The time spent on this case
20 can be summarized as follows: (1) approximately 12-hours speaking to my attorneys discussing
21 my experience working for Defendant, the locations where I worked, my schedule, the time
22 keeping and payroll procedures, how shifts were actually handled (i.e. start and end times,
23 schedules for breaks), the work I performed while working for Defendant, meal and rest break
24 policies, including how breaks were taken, how frequently, and any interruptions caused by
25 work requirements, and other policies and practices I experienced as an employee of Defendant;
26 (2) approximately 8-hours collecting and gathering documents that I received while working for
27 Defendant and helping form responses to written discovery requests; (3) approximately 3-hours
28 answering questions in preparation for mediation; (4) approximately 10-hours being available

1 and attending mediation telephonically; (5) approximately 15-hours collectively speaking to my
2 attorneys throughout this lawsuit calling my attorneys and speaking to them about the progress
3 of the case; (6) approximately 6-hours providing information for and reviewing my declarations
4 in support of the motion for class certification and in opposition of Defendant's motion to
5 summary judgment; (7) approximately 6-hours discussing the proposed Settlement terms and
6 the motion for preliminary and final approval with my attorneys – all of which culminates to
7 about 72 hours spent on this case. Accordingly, I believe I am an adequate class representative.

8 **Risks Assumed**

9 7. In addition to performing the work and spending time on this matter, I assumed
10 risk in serving as a class representative. I understood that there was a risk that I could be
11 responsible for Defendant's litigation costs if we lost the case. However, I accepted this risk
12 because I believed that the claims in this lawsuit were legitimate and that there were other
13 employees who suffered from the same issues. I also understood that by agreeing to file this
14 lawsuit, my name would be listed as the class representative, which is a public record. Thus, if
15 another company performed a background check, or even a basic google search using my name
16 and "class action," my involvement in a class action could be confirmed. I understand that there
17 is a risk that future employers may not want to hire an employee, who was previously a class
18 representative in a class action case.

19 **Conflicts with Proposed Class Members**

20 8. I do not have any conflicts with any proposed Class Member in this lawsuit. I do
21 not have any personal relationship or family ties to the attorneys who represent me, or the Court.
22 I am not involved in any type of litigation against any proposed Class Member in this lawsuit.
23 My attorneys, Solouki & Savoy, LLP, and James Hawkins APLC, are only working on my
24 behalf in this lawsuit, and do not represent me in other matters.

25 **Other Class Action Involvement**

26 9. I have never been a class representative in any other case, pending or closed,
27 other than in this action alone.

28 ///

Fairness of Settlement

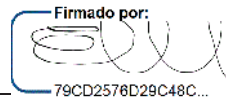
10. Based on my review of the settlement terms, conversations with my attorneys, and the risks of continuing this lawsuit, I believe the settlement is fair, adequate and in the best interest of the employees covered by the settlement.

Benefits Received by Participating as the Class Representative

11. I have not received any benefits from participating as the Class Representative in this lawsuit. I understand that I will not receive any special benefits or recovery not afforded to other members of the class, except as warranted and approved by the court.

I have reviewed this written statement and fully understand all of its contents. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 17, 2025 at Los Angeles, California.

Firmado por:


79CD2576D29C48C...

ELIZABETH QUIROGA CARRERO