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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

JENNIFER RAHAIM, LIZBETH
MARTINEZ, and FIONA KING, as
individuals and on behalf of all others
similarly situated,

Plaintiffs,

vs.

LANGHAM HOTELS PACIFIC
CORPORATION dba THE LANGHAM
HUNTINGTON, PASADENA, a Delaware
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 25STCV10715
(Related to Case Nos: 25STCV17624 and
25STCV24715)

Honorable Samantha P. Jessner
Department 7

**DECLARATION OF PLAINTIFF
FIONA KING IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: January 27, 2027
Time: 10:00 a.m.
Dept: 7

Complaint Filed: April 9, 2025
FAC Filed: June 16, 2025
SAC Filed: August 31,
Trial Date: 2026 Not Set

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1 **DECLARATION OF FIONA KING**

2 I, Fiona King, declare and state as follows:

3 1. I am over the age of eighteen (18) and a resident of the State of California. I am one
4 of the named plaintiffs in the above-captioned case. I have personal knowledge of the facts and
5 statements set forth in this declaration, and if called upon to testify, I could and would competently
6 testify thereto.

7 2. I was employed by Defendant Langham Hotels Pacific Corporation dba The Langham
8 Huntington, Pasadena ("Defendant") as an hourly-paid, non-exempt In-Room Dining Coordinator
9 from approximately December 2021 to approximately November 2025.

10 3. Because I thought the practices at Defendant may not be lawful, I decided to seek legal
11 advice about my work experiences at Defendant and about filing a lawsuit to obtain relief for my
12 grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps
13 to make sure Defendant was held accountable for not properly compensating its employees for all
14 hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also
15 investigated class and representative action lawsuits on my own. Thereafter, I further consulted with
16 the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits
17 under the Private Attorneys General Act ("PAGA"), and what it meant to bring a class and PAGA
18 action so that I understood what I was considering doing.

19 4. I have regularly conferred with my attorneys regarding the case as part of my
20 responsibilities as a class and PAGA representative. This process included searching for and providing
21 documents concerning my employment with Defendant, answering any questions my attorneys had
22 about the documents, providing information regarding the company's practices and the duties of other
23 hourly-paid and/or non-exempt employees, and helping my attorneys develop a strategy as to what
24 additional documents and information they could seek to obtain from Defendant.

25 5. I routinely checked in with my attorneys and their staff to make sure that they had all
26 of my most current information and any additional information that I had obtained. I made myself
27 available to answer any questions my attorneys had about Defendant's practices and treatment of its
28 employees whenever they needed me. I responded to them as quickly as possible and gave them as

1 much information as I could.

2 6. I understood that in the event this matter did not settle and proceeded with trial, I would
3 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
4 responsibilities that are necessary for this lawsuit.

5 7. I know that I took a sizeable risk by bringing and pursuing this matter for several
6 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
7 also understood there was a risk of losing any job and/or income due to the time that I would have to
8 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. In
9 contrast, the other employees who will be receiving money from this lawsuit did not have to file a
10 claim or take the risk that I took in bringing this action.

11 8. I reviewed the settlement agreement, discussed the settlement agreement with my
12 attorneys, and asked them questions before signing it.

13 9. I believe that I have done everything that my attorneys have asked of me and tried, to
14 the best of my ability, to seek relief for the Class, the Aggrieved Employees, and the State of
15 California. I have spent approximately 40-45 hours participating in this matter as described above. I
16 believe my efforts helped get the result obtained in this matter.

17 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
18 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times
19 throughout the course of this litigation I have considered the interests of the Class and put them before
20 my own personal interests.

21 11. I understand that incentive or enhancement awards are discretionary and intended to
22 compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and
23 other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA
24 action, and an acknowledgment of the benefits resulting from the representative's actions. I believe
25 my work in this matter is meritorious on these points for the reasons set forth above.

26 12. I respectfully request that the Court approve and award me a Class Representative
27 Enhancement Payment in the amount of \$7,500.00 for my efforts and active participation in the case
28 and for the broader, general release of all claims that I have or may have against Defendant in

1 connection with the settlement. Taking into consideration the time that I dedicated to this case, I
2 believe that this amount is reasonable.

3 13. I understand that Blackstone Law, APC and Haines Law Group, APC will share the
4 attorneys' fees in this matter. I agreed to this in writing. I understand that the amount of attorneys'
5 fees will not increase as a result of this fee sharing.

6 14. I am not related to anyone associated with Blackstone Law, APC or Haines Law Group,
7 APC.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing
9 is true and correct. Executed on 09/08/2026, at Los Angeles, California.

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