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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

JUN MOCK, on behalf of the State of
California, as a private attorney general,

Plaintiff,

v.

BLACKSTONE GAMING, LLC., a California
Limited Liability Company; and DOES 1
through 50, inclusive,

Defendants.

Case No. 23LBCV00084

**DECLARATION OF JUN MOCK IN
SUPPORT OF MOTION TO APPROVE
PAGA SETTLEMENT**

Hearing Date: March 17, 2026

Hearing Time: 8:30am

Judge: Hon. Mark C. Kim

Dept.: S27

Action Filed: January 13, 2023

Trial Date: Not Set

1 I, Jun Mock, declare:

2 1. I am a competent adult, I have personal knowledge of the facts in this declaration,
3 and I am making this declaration on behalf of myself, as a named plaintiff, and in support of the
4 Motion to Approve Private Attorneys General Act Settlement.

5 2. I worked in California as a non-exempt employee of Defendant from January of 2017
6 to January of 2026.

7 3. I retained my attorneys who are experienced in PAGA representative action
8 litigation and claims against employers for violations of the California Labor Code. I have no
9 personal relationship or family ties to my attorneys or any officer of the Court. I am not aware of
10 having any actual or potential conflicts of interest with another PAGA Member in this case nor am
11 I aware of having any actual or potential conflicts of interest with the settlement administrator in
12 this matter.

13 4. I was subject to Defendant's policies and practices that have been alleged as
14 unlawful in the Complaint and the PAGA notice sent to the Labor and Workforce Development
15 Agency. For example, I was forced to work off the clock, as Defendant only provided one digital
16 punch clock at a podium to clock in, and I would often have to wait several minutes to clock in at
17 the beginning of shifts. I would also commonly receive phone calls while off the clock from
18 supervisors asking me to come in and cover short staffed conditions. Further, Defendant required
19 COVID-19 screenings to occur while off the clock, and at the end of my shifts, I was subjected to
20 bag check after I had already clocked out for the day. Additionally, I did not always receive
21 compliant meal and rest breaks, which were often late, short, interrupted, or missed entirely – and
22 when these violations occurred, I did not receive all break penalty payments I was entitled to.
23 Further, I was not reimbursed for business expenses incurred in furtherance of my job duties,
24 including the use of my personal cell phone, and vehicle which was used to drive between casinos
25 to relieve other employees of their duties.

26 5. In bringing this case for myself, the State of California, and the other employees, I
27 understood a lot of work would be required and I was willing to, and did, do the work to keep the
28 case moving forward. For instance, before the complaint was filed I spoke to my attorneys several

1 times and discussed how Defendant implemented its company policies and procedures. I also
2 assisted my attorneys in their investigation into my claims by providing them documents and
3 answering their questions. I reviewed the complaint before it was filed and after it was filed, I was
4 given access to an electronic file sharing program that alerted me via email when important
5 documents were filed so that I could review them and keep up with the developments in the case.
6 Also, on April 24, 2025, I had my deposition taken by Defendant, and I spent numerous hours
7 adequately preparing in order to give my testimony on my experiences.

8 6. My attorneys explained to me the risks and benefits of bringing a representative
9 action. I understood that I took on the risk, both professionally and financially, in pursuing the case
10 as a representative PAGA action.

11 7. A mediation took place on January 9, 2024 with the Hon. Daniel Buckley (Ret.), a
12 well-respected and experienced mediator. The mediation ultimately resulted in an agreement to
13 settle the action. I communicated with my attorneys regarding the terms of the settlement which
14 was reached between the parties and understood that the recovery in this case was for the benefit of
15 my fellow coworkers, not just for me, and therefore wanted the best possible result to be obtained
16 for the PAGA Members. I reviewed and signed the Memorandum of Understanding, and on January
17 22, 2026, I reviewed and signed the PAGA Settlement Agreement..

18 8. I have been actively involved with this lawsuit. Although I did not keep time
19 records, I was in regular contact with my attorneys, reviewed court filings, and spent a significant
20 amount of time on the issues presented during the lawsuit and in the settlement process. I estimate
21 that I spent approximately 30-40 hours working on this case up until this point.

22 9. I reviewed the final PAGA Settlement Agreement, and I believe it is fair and
23 reasonable given the facts of the case.

24 I declare under penalty of perjury under the laws of the State of California that the foregoing
25 is true and correct.

26 Executed on 02/18/2026, at Pasadena, CA.
(date) (city, state)

27 Jun Mock
28 Jun Mock (Feb 18, 2026 12:52:49 PST)

Jun Mock