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Attorneys for Plaintiff Darryl Burrows
and Proposed Class Counsel

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

DARRYL BURROWS, on behalf of
himself and all “aggrieved employees”
pursuant to Labor Code § 2698 *et seq.*,

Plaintiff,

v.

HOSPITALITY SERVICES GROUP LLC,
an Indiana limited liability company, and
DOES 1 through 10, inclusive,

Defendants.

CASE NO: 37-2023-00013910-CU-OE-CTL

Assigned to the Hon. Richard S. Whitney, Dept. C-68

**DECLARATION OF DARRYL BURROWS IN
SUPPORT OF UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT AND LEAVE TO
FILE FIRST AMENDED COMPLAINT**

DATE: January 24, 2025

TIME: 10:30 a.m.

DEPT.: C-68

Reservation # 3145201

Action Filed: April 4, 2023

I, DARRYL BURROWS, hereby declare and state as follows:

1. I am a named Plaintiff in this lawsuit against Defendant Hospitality Services Group LLC (“Defendant”) and I submit this declaration in support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement. I am a competent adult and worked for Defendant as a non-exempt employee in San Diego County during the relevant time period. I have personal knowledge of the facts set forth herein, and if called as a witness to testify to them, I could and would do so competently.

1 2. I contacted my current attorneys when I questioned the employment practices of
2 Defendant prior to commencing this lawsuit. I accepted the opportunity to act as a Class
3 Representative in a class action on behalf of other employees of Defendant who I believed were
4 being subjected to labor law violations. Although presented with the opportunity, I did not pursue
5 this case on an individual basis and instead did so as a class action so that I could help other
6 employees recover for what I believed were Defendant's illegal practices.

7 3. Specifically, I questioned Defendant's policies of failing to provide all meal and rest
8 periods, failing to timely compensate employees upon separation, and issuing its employees
9 deficient wage statements. Through many discussions with my lawyers, I learned these may be
10 illegal practices and Defendant's employees might have recourse for them.

11 4. By bringing this lawsuit, and throughout its course, I have put the interests of the
12 class ahead of my own. I understood that I could possibly earn a small enhancement payment if
13 this case resolved itself favorably, but always knew that I could also be responsible for paying
14 Defendant's attorneys' fees and costs if it did not. My goal in bringing this lawsuit was to obtain
15 a recovery on behalf of the class, and even more importantly, to put an end to what I believed were
16 illegal practices on the part of Defendant. I believe I have achieved both through this lawsuit and
17 settlement.

18 5. I am very happy about the results of this litigation. I am satisfied that Defendant is
19 compensating class members for premium wages, penalties, and interest that I believe we are due.

20 6. At the onset of this case, I spent time through numerous phone calls with several of
21 my attorneys explaining what I understood to be the policies and procedures of Defendant and
22 how they were applied to me and others I worked with. During the course of this litigation, up
23 through and following the settlement process, I kept actively involved with its status, tracking the
24 status of the case and participating as much as possible.

25 7. While I have not maintained detailed time records of my activities in connection
26 with this litigation, I believe that have spent a total of approximately 18.5 hours assisting my
27 attorneys with the preparation of this case, and doing work and analysis independent from my
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1 attorneys both before and during this case, including conducting an independent investigation of
2 the facts.

3 8. Before this litigation commenced, and throughout its course, I have spent
4 approximately 6.5 or more hours gathering, organizing, and reviewing documents and information
5 for this lawsuit. I sifted through many of my own documents and reviewed information produced
6 by Defendant as part of this case.

7 9. I have communicated with my attorneys several times per month to track my case's
8 status. I have taken an active involvement in this matter throughout its course.

9 10. This lawsuit will almost certainly result in reputational harm to me. There is a
10 stigma associated with suing anyone, let alone your former employer. I will probably be adversely
11 affected when it comes to obtaining future employment – employers who learn that I sued
12 Defendant in a class action will likely avoid hiring me.

13 11. I do not believe that I have any conflicts with other members of the class. My
14 interests in bringing this lawsuit – for Defendant to change its labor practices going forward and
15 to compensate current and former employees – are the same as those of all other class members.

16 I declare, under penalty of perjury, under the laws of the State of California, that the
17 foregoing is true and correct.

18 Executed on this ^{06 / 17 / 2024} ___th day of June, 2024 at Valrico, Florida.

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22 DARRYL BURROWS
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