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Attorneys for Plaintiffs
Gregory Edgar Spencer and
Jennifer Lynn Woodruff

SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

GREGORY EDGAR SPENCER, an
individual, on his own behalf and on behalf of
all others similarly situated; JENNIFER
LYNN WOODRUFF, an individual, on her on
behalf and on behalf of all others similarly
situated,

Plaintiffs,

vs.

BEL AIRE HOSPITALITY LLC dba MOTEL
6 STANTON, an Arizona limited liability
company; and DOES 1 through 100, inclusive,

Defendants.

CASE NO. 30-2023-01304470-CU-OE-CXC

**DECLARATION OF PLAINTIFF
GREGORY EDGAR SPENCER IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Judge: Hon. David A. Hoffer

Date: March 16, 2026

Time: 1:30 P.M.

Dept.: CX 103

Complaint Filed: January 25, 2023

Reservation ID: 74723474

DECLARATION OF GREGORY EDGAR SPENCER

I, Gregory Edgar Spencer, hereby declare:

1. The facts set forth herein are true of my own personal knowledge, and if called upon to testify thereto, I could and would competently do so under oath.

2. I am one of the named Plaintiffs in this action. On or around January 25, 2023, the Class Action Complaint entitled *Spencer v. Bel Air Hospitality LLC dba Motel 6 Stanton*, was filed in the Superior Court of California, Orange County, on behalf of myself, and all others similarly situated. On April 8, 2024, Plaintiffs filed their First Amended Class Action Complaint in the Orange Superior Court, adding Jennifer Lynn Woodruff as a Named Plaintiff and a claim pursuant to the Private Attorney General Act of 2004, Cal. Lab. Code §§2699, *et seq.*

3. I was employed by Defendant Bel Aire Hospitality LLC dba Motel 6 Stanton (“Defendant”) as a non-exempt hourly Guest Services Representative from September 22, 2021 through July 17, 2022.

4. In my Guest Services Representative capacity for Defendant, I was required to work in excess of 8 hours per day and 40 hours per week. Further, at times I was required to work in excess of 12 hours per day. However, Defendant failed to pay me my overtime/double time wages owed. Defendant also failed to pay me minimum wages due to their failure to afford compliant meal/rest breaks. Further, Defendant also failed to afford me compliant meal/rest breaks. Additionally, Defendant did not provide me with a uniform maintenance allowance and I was required to clean my uniforms myself.

5. I understand that, as a Class Representative, I have a duty to look out for and protect the interests of the Class as a whole. I do not believe, nor do I have any reason to believe, that my interests in this lawsuit are in conflict or in any way antagonistic to the interests of those of my fellow Class Members.

6. As one of the named Plaintiff in this action, I provided significant assistance to Plaintiffs’ Counsel in this case. Since this lawsuit was filed, I communicated frequently with my attorneys. In order for me to provide factual background for the Class Action Complaint and FAC,

1 it was necessary for me to recall and memorialize events from my former employment with
2 Defendant, participate in multiple initial intake interviews, produce employment documents and be
3 available for follow up calls, emails, and text messages from my attorneys. Throughout the course
4 of this litigation, I participated in several phone calls with my attorneys plus numerous text
5 message and email exchanges, in order to provide such information.

6 7. My attorneys also requested that I provide them with paystubs and other personnel
7 file documents in my possession documenting my time working for Defendants. Prior to becoming
8 involved in this litigation, it was not my normal habit to keep every single paystub I received, and
9 for the ones that I did keep, I was not sure where they were. It took me several hours over the span
10 of a couple of days to locate all the paystubs and other documents requested by my attorneys which
11 were in my possession.

12 8. Once the Class Action Complaint and FAC were drafted, my attorneys had me
13 review the allegations for accuracy. At times, I would have questions, and would need to set up a
14 call to have my questions answered as part of the review process. This involved phone calls with
15 my attorneys as well as responding to emails and text messages to provide clarifying information to
16 assist with revisions of the pleadings. This took several hours of my time. I had several such
17 telephone conversations with my attorneys that lasted more than one hour each time.

18 9. My attorneys also had me review other documents which were either filed with the
19 Court or necessary to litigate and eventually settle this matter. These included the other pleadings
20 filed with the Court, the PAGA Letter to the Labor and Workforce Development Agency, the
21 Mediation Brief, and the Settlement Agreement. This process required me to review these
22 documents and confer with my attorneys about the accuracy of allegations and gave me an
23 opportunity to ask questions and clarify my understanding of these documents, which was time
24 consuming.

25 10. Moreover, I attended the mediation remotely for this matter on May 22, 2025.

26 11. My attorneys spent additional time with me on the phone answering my questions. I
27 estimate that I have spent as many as 35 total hours working with my attorneys on this case.

12. In addition, this case also involved risks for me, such as the risk of having to pay Defendant's costs if we lost. Disregarding these risks, I pursued this case on behalf of the Class to a successful resolution and settlement.

13. It is my understanding that based upon my industrious efforts as one of the Named Plaintiffs in this action there is something called a Class Representative Service Payment. I respectfully request that the Court grant this award to me in the amount of \$2,500 in addition to my pro rata share of the settlement fund.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on Dec 8, 2025 in Anaheim, California.


Gregory Spencer (Dec 8, 2025 10:40:25 PST)

Gregory Edgar Spencer

Declaration of Spencer ISO Preliminary Approval

Final Audit Report

2025-12-08

Created:	2025-11-28
By:	Linda Beck (lindab@kallaw.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAkC4xQvEA06UQPLPIdnEAxsG0fk38NSfs

"Declaration of Spencer ISO Preliminary Approval" History

-  Document created by Linda Beck (lindab@kallaw.com)
2025-11-28 - 11:29:18 PM GMT
-  Document emailed to edgargspencer59@gmail.com for signature
2025-11-28 - 11:29:50 PM GMT
-  New document URL requested by Linda Beck (lindab@kallaw.com)
2025-12-08 - 6:35:07 PM GMT
-  Email viewed by edgargspencer59@gmail.com
2025-12-08 - 6:38:03 PM GMT
-  Signer edgargspencer59@gmail.com entered name at signing as Gregory Spencer
2025-12-08 - 6:40:23 PM GMT
-  Document e-signed by Gregory Spencer (edgargspencer59@gmail.com)
Signature Date: 2025-12-08 - 6:40:25 PM GMT - Time Source: server
-  Agreement completed.
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PROOF OF SERVICE

I certify and declare that I am over the age of 18 years and not a party to this action and that my place of employment is in the County of Los Angeles, State of California, located at 880 Apollo St., Suite 336, El Segundo, California 90245. My electronic service address is: LindaB@kallaw.com.

On this date hereon, I served a true copy of the following document(s):
DECLARATION OF PLAINTIFF GREGORY EDGAR SPENCER IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION
SETTLEMENT

By sending a true copy thereof to the address(es) listed below:

Alfred J. Landegger, Esq. Roxana E. Verano, Esq. James M. Bacon, Esq. Sophia Emrana, Esq. Evelyn Zarraga, Esq. LANDEGGER VERANO, ALC 15760 Ventura Boulevard, Suite 1200 Encino, California 91436 Telephone: (818) 986-7561 Facsimile: (818) 986-5147	Attorneys For Defendants, <i>BEL AIRE HOSPITALITY, LLC. DBA MOTEL 6 STANTON</i> VIA EMAIL: alfred@landeggeresq.com roxana@landeggeresq.com james@landeggeresq.com evelyn@landeggeresq.com sophia@landeggeresq.com
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x	By E-Mail or Electronic Transmission. I caused the documents to be sent to the persons at the email address(es) listed above in a PDF file, and the transmission appeared to be successful.
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I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed on December 9, 2025, at El Segundo, California, 90245.



Linda Beck