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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

MANUEL REFUGIO GARCIA, individually, and on behalf of all others similarly situated,

Plaintiff,

v.

ALMANSOR COURT INC., a California Corporation; MAVERICK HOSPITALITY INC., a California Corporation; and DOES 1 through 10, inclusive,

Defendants

Case No.: 25STCV28925

[Assigned for all purposes to the Hon. Carolyn B. Kuhl, Dept. 12]

DECLARATION OF MANUEL REFUGIO GARCIA IN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF PAGA SETTLEMENT

Complaint filed: September 30, 2025
Trial date: None Set

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DECLARATION OF MANUEL REFUGIO GARCIA

I, Manuel Refugio Garcia, declare as follows:

1. I am over the age of eighteen and a resident of California. I am the named plaintiff in the matter and have personal knowledge of the facts set forth herein. If called as a witness, I could and would testify to them competently.

2. I make this declaration in support of Plaintiff's Motion for Approval of PAGA Settlement.

3. I worked for Defendants Almansor Court Inc. and Maverick Hospitality Inc. ("Defendants") in California as an hourly-paid, non-exempt employee from approximately May 2023 to May 2025. To the best of my knowledge, I was subject to the same policies and practices as the other non-exempt employees who worked for Defendants ("Aggrieved Employees").

4. I understand that, acting as a private attorney general in this lawsuit, I am asking the Court to award civil penalties on behalf of the State of California and all Aggrieved Employees, including myself, which are allocated 65% to the Labor and Workforce Development Agency ("LWDA") and 35% to Aggrieved Employees based on the number of pay periods we worked for Defendants.

5. I was made aware that being the plaintiff in a lawsuit, especially one suing a former employer on behalf of other people, could subject me to unwanted attention and adversely affect future job opportunities. For example, I understand not only that the lawsuit is a public document, but also that a letter will be mailed to approximately 67 Aggrieved Employees to explain why they are getting a share of the settlement funds. The letter will disclose to them that I filed this representative action against Defendants, which potentially risks potential employment for me because these Aggrieved Employees worked, or still work, for Defendants but may move to different companies in the industry or know people at other similar companies who may not want to hire someone who sued an employer.

6. I was also aware that, even acting as a private attorney general for the LWDA, I might be responsible for some or all of Defendants' legal costs if the lawsuit was not successful and that the lawsuit could continue for several years and require my time and attention until it was

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resolved. I also understood that, even if we won at trial, resolving the lawsuit could be delayed by appeals.

7. Despite these risks, I chose to go forward, though I was still nervous about the potential risks, especially the possibility of losing the lawsuit and having a judgment filed against me for costs or missing out on future job opportunities.

8. It was important to me that this lawsuit was successful, and I have spent a lot of time and effort on the litigation. My efforts have included gathering my employment records and providing them to my attorneys, discussing my records and my work experience with my attorneys, and participating in settlement discussions. I reviewed the settlement papers and stayed in touch with Wilshire Law Firm during the settlement negotiations. I estimate that since I retained Wilshire Law Firm, I have spent approximately 40 hours on these activities.

9. Aside from the service award requested on my behalf, I will receive the same benefit as all other Aggrieved Employees. However, unlike them, in addition to the claim for civil penalties under PAGA that we all release, I agreed to, and signed, a general release of claims against Defendants, even those I have not brought against Defendants.

10. As far as I am aware, I have no actual or even potential conflict of interest with any Aggrieved Employee in this lawsuit or with Phoenix Settlement Administrators, the settlement administrator that the Parties agreed to use.

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

Executed on 10/1/2026, at Los Angeles, California.

Signed by:
46FD60D44974436...
Manuel Refugio Garcia