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Attorneys for Plaintiff Venice Moses, individually, and
on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MONTEREY

VENICE MOSES, individually, and on behalf of
all others similarly situated,

Plaintiff,

v.

CVAC, INC. dba CARMEL VALLEY
ATHLETIC CLUB and CVAC and REFUGEE,
an Illinois corporation; and DOES 1 through
10, inclusive,

Defendants.

Case No.: 23CV001337

Assigned for all purposes to:
Hon. Thomas W. Wills, Dept. 15

**DECLARATION OF VENICE MOSES IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: November 22, 2024
Time: 8:30 a.m.
Dept.: 15

I, Venice Moses, hereby declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of my Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for CVAC, Inc. dba Carmel Valley Athletic Club and CVAC and Refugee (“CVAC”) as an hourly-paid, non-exempt massage therapist from around January 1, 2020 to May, 2022.

3. Based on my experience and knowledge of CVAC’s wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on my own behalf as well as on behalf of other hourly-paid, non-exempt employees of CVAC.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to other hourly-paid, non-exempt employees of CVAC. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other hourly-paid, non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid, non-exempt employees at CVAC.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid, non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by CVAC’s company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by CVAC.

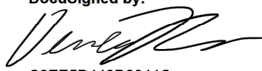
7. I have always kept the best interests of the other hourly-paid, non-exempt employees in mind while performing my duties as the named plaintiff in this case. I have been committed throughout the course of this case to vigorously prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the other hourly-paid, non-exempt employees by initiating this lawsuit, providing documents and

1 information to my attorneys, keeping in regular contact with my attorneys regarding the status of
2 the case, and reviewing the settlement agreement to make sure it was fair.

3 8. I will continue to actively participate in this lawsuit as necessary and will continue
4 to make myself available to assist in this case moving forward as needed.

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

7 Executed on October 28, 2024 at Salinas, California.

8 DocuSigned by:
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