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6 Attorneys for Plaintiff(s),

7 TAYLOR SNOW, and all others similarly situated

(Additional attorneys for Plaintiff(s) on following page)

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9
10 **FOR THE COUNTY OF MONTEREY**
11 **(UNLIMITED JURISDICTION)**

12 TAYLOR SNOW, on behalf of herself and as an
13 “aggrieved employee” on behalf of other
14 “aggrieved employees” under the Labor Code
Private Attorneys General Act of 2004,

15 *Plaintiff,*

16 vs.

17 555 OCEAN VIEW BLVD LLC (D/B/A
18 SEVEN GABLES INN), a California limited
liability company; KIRKWOOD
19 COLLECTION, INC., a California corporation;
KIRKWOOD COLLECTION HOLDINGS
20 LLC, a California limited liability company; and
DOES 1–50, inclusive,

21 *Defendants.*

Case No. 23CV001630

**DECLARATION OF TAYLOR SNOW
IN SUPPORT OF PLAINTIFF’S
MOTION FOR APPROVAL OF PAGA
SETTLEMENT**

Hearing Date: May 22, 2026

Hearing Time: 8:30 a.m.

Hearing Dept.: 14, The Honorable Ian A.
Rivamonte

Action filed: May 19, 2023



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1 **DECLARATION OF TAYLOR SNOW IN SUPPORT OF MOTION FOR APPROVAL**
2 **OF PAGA SETTLEMENT**

3 I, TAYLOR SNOW, declares as follows:

4 1. I am a resident of the City of Carmel in the State of California and am over 18
5 years of age. I am the named Plaintiff in this action and am represented by David Spivak of The
6 Spivak Law Firm and Walter Haines of United Employees Law Group in this action. Except as
7 otherwise stated, I have personal knowledge of all matters set forth in this declaration and could
8 and would competently testify thereto if called upon to do so as a witness.

9 2. My employment with Defendants began on or about January 18, 2022 and ended
10 on June 20, 2022. I worked at 555 Ocean View Blvd LLC (D/B/A Seven Gables Inn), Inc. as a
11 non-exempt, hourly reservationist and front desk agent.

12 3. I understand that I am the Plaintiff and that 555 Ocean View Blvd LLC (D/B/A
13 Seven Gables Inn), Kirkwood Collection, Inc., and Kirkwood Collection Holdings LLC are the
14 Defendants (collectively "Defendants"). I understand that my name is on the cover of the
15 lawsuit. I understand that I am the representative of other Defendants' employees. As the
16 representative in this lawsuit, I have duties to the State of California and other employees like
17 me who didn't receive compensation for all hours worked, duty-free meal and rest periods, and
18 reimbursement for their business expenses. I also understand that my lawsuit is on behalf of the
19 State of California. I have fairly represented the other employees and the State throughout this
20 lawsuit.

21 4. I participated in the mediation that ended with a Settlement Agreement between
22 me, on behalf of the State of California and the other hourly employees of Defendants, and the
23 Defendants. I understand that the Court will decide whether to approve the Settlement if it is in
24 the best interests of Defendants' other hourly employees and the State. I don't have any
25 disagreements with the other that Defendants' employees I represent. I am not aware of any
26 reason why I can't make the best decisions for them in this lawsuit. As part of this Settlement,
27 I am giving up my right to sue Defendants for anything.

28 7. When I agreed to hire my attorneys to file this lawsuit, I also agreed that I would



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1 be the representative of the other employees and the State of California. In agreeing to be their
2 representative, I agreed that their interests in the lawsuit are as important as my personal
3 interests in suing Defendants. I agreed that when deciding whether or not to settle this lawsuit,
4 I would do what is in the best interest of the other employees and the State. I also agreed to
5 actively participate in the lawsuit by answering questions and requests for documents and other
6 evidence by my attorneys and Defendants' attorney. I understand that this process is known as
7 "discovery." I understand that I also agreed to be interviewed under oath by the attorneys of
8 Defendants I understand that this process is known as a "deposition." As the representative of
9 the other employees and the State of California, I have agreed to travel to the Court and to the
10 offices of the lawyers for Defendants to testify about the case. I also understand that there will
11 only be a settlement of the lawsuit if the Court allows it. As the representative of the other
12 employees and the State of California, I have agreed to follow the progress of the lawsuit. I
13 have done this since I hired my attorneys by reading the court documents they send me and by
14 speaking with them over the phone. I understand that, even though I agreed to perform these
15 tasks and accept this responsibilities, the Court can choose not to approve any more money
16 from the Settlement to me than the other Defendants' employees will receive, even though they
17 have not performed these tasks and accepted these risks and responsibilities. I have spent over
18 several hours of my time on activities related to this lawsuit, including reading the court
19 documents and speaking with my attorneys. The work I have done on this case includes hiring
20 my attorneys, speaking with my attorneys on many occasions by phone, explaining what my
21 employment at Defendants were like, explaining what my employment at Defendants have in
22 common with other employees who worked for Defendants, helping my attorneys find
23 witnesses, documents, and other evidence, explaining my claims to my attorneys, attending a
24 full day of mediation and deposition, and communicating with my attorneys about the
25 settlement agreement and related documents. I have also carefully reviewed the Settlement
26 Agreement and other documents to make sure that the Settlement and other work my attorneys
27 performed are in the best interests of the employees I represent and the State of California.

28 8. Because I filed this lawsuit, there is a public record at the Court showing my

1 name on the cover of the complaint for anyone to see. Any potential employer who finds the
2 lawsuit will know I sued a former employer. This could hurt my reputation. This could prevent
3 a potential employer from choosing to hire me.

4 9. Based on the time I have spent on the lawsuit, the risk I will have to pay
5 Defendants' court costs if I lose, the harm to my chances of getting jobs in the future, and my
6 agreement to give up any personal claims for unpaid wages and monetary penalties I have
7 against Defendants.

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

10 Executed on 04 / 20 / 2026 at Carmel, California.

Taylor Snow

TAYLOR SNOW,
Declarant



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