

Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Yasmin Hosseini (SBN 326399)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

DAMIAN VANN, individually, and on behalf of other members of the general public similarly situated and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act;

Plaintiff,

vs.

PRISM HOSPITALITY, LP, an unknown business entity; PRISM HOTELS & RESORTS, and unknown business entity; HYATT REGENCY LOS ANGELES INTERNATIONAL AIRPORT, an unknown business entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 21STCV07019

Honorable Stuart M. Rice
Department SSC1

CLASS ACTION

DECLARATION OF DAMIAN VANN IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

[Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Declarations of Proposed Class Counsel (Yasmin Hosseini); and [Proposed] Order filed concurrently herewith]

Date: February 19, 2025
Time: 10:30 a.m.
Department: SSC1

Complaint Filed: February 23, 2021
FAC Filed: December 10, 2024
Trial Date: None Set

DECLARATION OF DAMIAN VANN

I, **Damian Vann**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Prism Hospitality, LP and SWC CA LAX dba Hyatt Regency Los Angeles International Airport (“Defendants”) from approximately August 2018 to approximately July 2019 as an hourly-paid, non-exempt Bar Back and Food Runner. I decided to seek legal advice about my work experiences with Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable for not properly compensating their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC, discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative.

3. I have spent substantial time and effort meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as

possible and gave them as much information and identified as many documents as I could. I spoke with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendants.

5. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I reviewed the settlement agreement and asked questions and discussed the potential settlement with my attorneys before signing the settlement agreement.

6. I understand that a settlement has been reached in my case and what my duties and responsibilities are as a class representative. For example, I am aware that if the settlement is granted preliminary approval, the Court will certify a class for settlement purposes, and likely appoint me as the representative of the class and my attorneys as counsel for the class. I also understand that my duties will include checking in on, monitoring, and conferring with my attorneys and counsel for the class to facilitate the notice and settlement administration process, and to provide information that the Court needs to assess whether the settlement is fair, reasonable, and adequate. Further, if any individuals who are potential class members contact me, I will take steps to have them referred to the Court-appointed settlement administrator so that these individuals may receive the necessary information and notice they may be eligible to receive in connection with the settlement and contemplated final approval hearing.

7. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the class and pursue relief on behalf of other class members and the State of California with respect to aggrieved employees. I have volunteered to represent and champion the interests of many other people with similar claims and injuries because of the importance of the cases and the necessity that all class members benefit from the lawsuits equally. I understand that as a proposed class representative, and if formally appointed as a class representative, I have and continue to represent the interests of all members of the class in litigation to recover relief for the class. I have claims that are typical of those of the class, consider the interests of the class just as I would consider my own interests and understand

that I may need to put the interests of the class before my own interests. I have and continue to actively participate in the lawsuit, as necessary. I understand that any resolution of the lawsuit is subject to court approval, and must be in the best interest of the class as a whole. I have also actively followed and monitored, and continue to follow and monitor, the progress of the lawsuit, and have taken steps to make sure, and continue to make sure, that the litigation is prosecuted by the skilled and effective attorneys that I have retained. I believe that I have no interests which are inconsistent with the interests of the class and that I have, and will continue to, adequately represent the class.

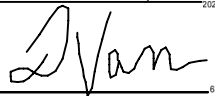
8. I think my efforts helped to get the result obtained in this matter, and as a class and PAGA representative, I respectfully request that the Court award me an enhancement payment in the amount of \$12,500.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

9. I am not related to anyone associated with Lawyers for Justice, PC.

10. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement payment, as well as my share of the settlement as a class member and as an aggrieved employee.

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

Executed this 11/25/2024 day of November 2024, at Rockledge, Florida

Electronically Signed 2024-11-26 01:40:52 UTC 190.105.143
Nintex AssureSign® 63770810-e177-4d9b-9cb1-6234000e1238


Damian Vann