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[Additional counsel on following page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

DEMARIS MASADAS and KOA GARCES,
individually, and on behalf of Aggrieved
Employees pursuant to the California Private
Attorneys General Act,

Plaintiffs,

vs.

CALIFORNIA DINNER
ENTERTAINMENT, LLC dba PIRATE'S
DINNER ADVENTURE, a Florida limited
liability company; and DOES 1 through 25,
inclusive,

Defendants.

Case No.: 30-2023-01354556-CU-OE-CXC

Honorable Melissa R. McCormick
Department CX105

**DECLARATION OF PLAINTIFF
KOA GARCES IN SUPPORT OF
MOTION FOR APPROVAL OF
SETTLEMENT OF CLAIMS BROUGHT
UNDER THE PRIVATE ATTORNEYS
GENERAL ACT AND REASONABLE
ATTORNEYS' FEES, COSTS, AND
ENHANCEMENT PAYMENTS**

Reservation ID: 74743689
Date: March 12, 2026
Time: 2:00 p.m.
Dept.: CX105

Complaint Filed: October 3, 2023
Trial Date: None Set

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DECLARATION OF KOA GARCES

I, Koa Garces, declare and state as follows:

1. I am over the age of eighteen (18) and a resident of the State of California. I am one of the named plaintiffs 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 Defendant California Dinner Entertainment, LLC dba Pirate's Dinner Adventure ("Defendant") as an hourly-paid, non-exempt Lead Server from approximately June 2019 to approximately January 2023.

3. Because I thought the practices at Defendant may not be lawful, I decided to seek legal advice about my work experiences at Defendant and about filing a lawsuit to obtain relief for my grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps to make sure Defendant was held accountable for not properly compensating its employees for all hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also investigated class and representative action lawsuits on my own. Thereafter, I further consulted with the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits under the Private Attorneys General Act (“PAGA”), and what it meant to bring a class and PAGA action so that I understood what I was considering doing.

4. I have regularly conferred with my attorneys regarding the case as part of my responsibilities as a PAGA representative. This process included searching for and providing documents concerning my employment with Defendant, answering any questions my attorneys had about the documents, providing information regarding the company's practices and the duties of other hourly-paid and/or non-exempt employees, and helping my attorneys develop a strategy as to what additional documents and information they could seek to obtain from Defendant.

5. 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. I made myself available to answer any questions my attorneys had about Defendant's practices and treatment of its employees whenever they needed me. I responded to them as quickly as possible and gave them as

1 much information as I could.

2 6. I understood that in the event this matter did not settle and proceeded with trial, I would
3 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
4 responsibilities that are necessary for this lawsuit.

5 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
6 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
7 also understood there was a risk of losing any job and/or income due to the time that I would have to
8 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. In
9 contrast, the other employees who will be receiving money from this lawsuit did not have to file a
10 claim or take the risk that I took in bringing this action.

11 8. I reviewed the settlement agreement, discussed the settlement agreement with my
12 attorneys, and asked them questions before signing it. I also executed a separate agreement to settle
13 and resolve my individual claims with Defendant.

14 9. I believe that I have done everything that my attorneys have asked of me and tried, to
15 the best of my ability, to seek relief for the Aggrieved Employees and the State of California. I have
16 spent approximately 30-35 hours participating in this case as described above. I believe my efforts
17 helped get the result obtained in this case.

18 10. I understand that any resolution of this lawsuit on a representative basis is subject to
19 court approval. At all times throughout the course of this litigation I have considered the interests of
20 the Aggrieved Employees and put them before my own personal interests.

21 11. I respectfully request that the Court approve and award me an Enhancement Payment
22 in the amount of \$5,000.00 for my efforts and active participation in the case. Taking into
23 consideration the time that I dedicated to this case, I believe that this amount is reasonable.

24 12. I understand that Blackstone Law, APC and Haines Law Group, APC will share the
25 attorneys' fees in this matter. I agreed to this in writing. I understand that the amount of attorneys'
26 fees will not increase as a result of this fee sharing.

27 13. I am not related to anyone associated with Blackstone Law, APC or Haines Law Group,
28 APC.

14. Other than the actions entitled *Masadas and Garces v. California Dinner Entertainment, LLC*, Orange County Superior Court, Case No. 30-2023-01349443-CU-OE-CXC and *Parcell v. California Dinner Entertainment, LLC*, Orange County Superior Court, Case No. 30-2023-01350262-CU-OE-CXC), I am not aware of any class, representative, or collective action in any other court that asserts claims similar to those asserted in this case.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 11/03/2025, at Whittier, California.

Koa Garces

Koa Garces