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Attorneys for Plaintiff

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

ROSS PHILLIPS, individually, and on behalf of
all others similarly situated,

Plaintiff,

v.

KING'S CASINO MANAGEMENT CORP., a
California corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: 23CV007240

*Assigned for all purposes to:
Hon. Lauri A. Damrell
Dept. 22*

**DECLARATION OF ROSS PHILLIPS IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

PRELIMINARY APPROVAL HEARING
Date: September 19, 2025
Time: 9:00 a.m.
Dept: 22

Complaint Filed: August 22, 2023
Trial Date: Not set

I, Ross Phillips, 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 Defendant King's Casino Management Corp. ("Defendant") as an hourly-paid, non-exempt employee from around July 2015 to June 2023 in the Citrus Heights location.

3. Based on my experience and knowledge of Defendant'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 Defendant.

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 Defendant. 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 Defendant's other hourly-paid, non-exempt employees.

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 Defendant'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 Defendant.

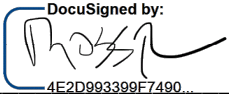
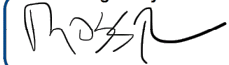
7. I have always kept the best interests of the other hourly-paid, non-exempt employees in mind while performing my duties as the named plaintiff in this case. I have been committed throughout the course of this case to vigorously prosecuting this case on behalf of myself and the other employees. I believe 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 information to my attorneys, keeping in regular contact with my attorneys regarding the status of

1 the case, assisting my attorneys prepare for mediation and making myself available on the day of
2 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 to
4 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
6 foregoing is true and correct.

7 Executed on ^{8/27/2025}_____, 2025, at Sacramento, California.

8 DocuSigned by:
9 
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10 Ross Phillips