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Attorneys for Plaintiff and the Class

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

VANCE COAR, 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.

HOTEL EQUITIES GROUP, LLC, a
Georgia limited liability company; and
DOES 1 through 100, inclusive,

Defendants,

Case No.: BCV-22-100229

Honorable Bernard C. Barmann, Jr.
Department H

CLASS ACTION

**DECLARATION OF VANCE COAR IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, ATTORNEYS'
FEES AND COSTS, AND
ENHANCEMENT AWARD**

[Notice of Motion and Motion for Final
Approval of Class Action Settlement,
Attorneys' Fees and Costs, and
Enhancement Award; Declaration of Class
Counsel (Yasmin Hosseini); Declaration of
Settlement Administrator (Jarrod Salinas);
and [Proposed] Final Approval Order and
Judgment filed concurrently herewith]

Date: March 14, 2025
Time: 8:30 a.m.
Department: H

Complaint Filed: January 26, 2022
FAC Filed: May 7, 2024
Trial Date: None Set

DECLARATION OF VANCE COAR

I, **Vance Coar**, 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 Hotel Equities Group, LLC (“Defendant”) from approximately January 2019 to approximately March 2020 as an hourly-paid Server. I decided to seek legal advice about my work experiences with Defendant 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 Defendant was held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. 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 for approximately 8 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 7 hours 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 eventually a PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a class representative, and also, if class certification were to be obtained, what my duties and responsibilities would be in that event.

3. I have spent over 20 hours 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 Defendant, 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 Defendant. 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. Throughout the case, I was available to answer any questions my attorneys had,

1 and available to speak and meet with my attorneys whenever they needed me. I responded to
2 them as quickly as possible and gave them as much information and identified as many
3 documents as I could. I spent at least 16 additional hours speaking with my attorneys about the
4 case, identifying potential witnesses, providing my attorneys with documents and information
5 concerning the case, and also describing policies, practices, and procedures of Defendant.

6 5. As far as the settlement is concerned, I was available to review documents and
7 answer any questions my attorneys had. I spent about 4 hours reviewing the settlement
8 agreement and about 5 hours asking questions and discussing the potential settlement with my
9 attorneys before signing the settlement papers.

10 6. I believe that I have done everything that my attorneys have asked of me and have
11 tried, to the best of my ability, to represent the class and seek relief for the aggrieved employees
12 and the State of California. I think my efforts helped to get the result obtained in this case, and
13 as a potential class and PAGA representative, I respectfully request that the Court award me an
14 enhancement award in the amount of \$10,000.00 for my active participation in this case, as well
15 as my broader release of claims. Taking into consideration the time that I have dedicated to this
16 case, I believe that this amount is reasonable.

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

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

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

08/30/2024

24 Executed this _____ day of August 2024, at Bakersfield, California

25 
26 Electronically Signed 08/30/2024 08:30:22:00:20 UTC - 174.134.136.173
Nintex AssureSign® 4128a5b-b136-4b0f-8716-b1dc016a7912

27 Vance Coar
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