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Attorneys for Plaintiff LUKE LEON

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

LUKE LEON, individually and on behalf of
others similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

vs.

BIGHORN GOLF CLUB dba BIGHORN
CLUBHOUSE, a California Nonprofit
Corporation; BIGHORN HOMEOWNERS
ASSOCIATION, INC. dba BIGHORN
HOMEOWNERS ASSOCIATION, a
California Nonprofit Corporation; BIGHORN
PROPERTIES, INC., a California
Corporation; and DOES 1 through 25,
inclusive,

Defendants.

Case No.: CVRI2400375

Honorable Harold W. Hopp
Department 1

**DECLARATION OF PLAINTIFF
LUKE LEON IN SUPPORT OF
MOTION FOR APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Complaint Filed: January 22, 2024

Trial Date: Not Set

1 **DECLARATION OF LUKE LEON**

2 I, Luke Leon, declare and state as follows:

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

6 2. I was employed by Defendant Bighorn Golf Club ("Defendant") as an hourly-paid,
7 non-exempt "privacy officer" from approximately October 2018 to approximately January 2023.

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

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

23 5. I routinely checked in with my attorneys and their staff to make sure that they had all
24 of my most current information and any additional information that I had obtained. I made myself
25 available to answer any questions my attorneys had about Defendant's practices and treatment of its
26 employees whenever they needed me. I responded to them as quickly as possible and gave them as
27 much information as I could. Additionally, I was available throughout two mediations to answer my
28 attorneys' questions about the case.

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

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

10 8. I reviewed the settlement agreement, discussed the settlement agreement with my
11 attorneys, and asked them questions before signing it.

12 9. I believe that I have done everything that my attorneys have asked of me and tried, to
13 the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California.
14 I have spent approximately 50 hours participating in this case as described above. I believe my efforts
15 helped get the result obtained in this case.

16 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
17 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times
18 throughout the course of this litigation I have considered the interests of the Class and put them before
19 my own personal interests.

20 11. I understand that incentive or enhancement awards are discretionary and intended to
21 compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and
22 other employees, the financial and/or reputational risk undertaken in bringing the class and PAGA
23 action, and an acknowledgment of the benefits resulting from the representative's actions. I believe
24 my work in this matter is meritorious on these points for the reasons set forth above.

25 12. I respectfully request that the Court approve and award me a Class Representative
26 Payment in the amount of \$10,000 for my efforts and active participation in the case. Taking into
27 consideration the time that I dedicated to this case, I believe that this amount is reasonable.

28 13. I am not related to anyone associated with Blackstone Law, APC.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct. Executed on 09/25/2025, at Oceanside, California.

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4 Luke Leon
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