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Attorneys for Plaintiffs REBECCA ORTEGA (SUAREZ) and SUSANA A. JIMENEZ LUJAN, in a Representative capacity only, and on behalf of other members of the general public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

REBECCA ORTEGA (SUAREZ) and
SUSANA A. JIMENEZ LUJAN in a
Representative capacity only, and on behalf
of other members of the general public
similarly situated,

Plaintiff,

v.

G & B HOTEL EMPLOYEE LEASING,
LLC, a Delaware Limited Liability Company;
C&L CLEANING SERVICES, INC., a
California Corporation; SWVP MDM LLC,
a Delaware Limited Liability Company; and
DOES 1-10, inclusive

Defendants

CASE NO 37-2024-00022041-CU-OE-CTL

**DECLARATION OF SUSANA JIMENEZ
IN SUPPORT OF PLAINTIFFS’
UNOPPOSED MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

Date: September 19, 2025
Time: 8:30 a.m.
Dept.: C-69
Judge: Hon. Evan P. Kirvin

1 I, Susana Jimenez, hereby declare as follows:

- 2 1. I am the named Plaintiff in the above-captioned matter. I make this declaration in support of
3 Plaintiff's Unopposed Motion for Approval of PAGA Settlement.
- 4 2. I am personally familiar with the facts set forth in this declaration, and if called to testify as a
5 witness I could and would do so.
- 6 3. To my recollection, I personally met with my Attorneys on at least 5 occasions. Several of
7 those meetings lasted in excess of 1 hour.
- 8 4. During these meetings, I would review and explain numerous documents turned over by
9 Defendants from my employment. I would also explain my (as well as others') role during
10 work. I also helped identify numerous other employees who could support the claims I was
11 making in this lawsuit. I contacted many of these individuals myself to verify their willingness
12 to participate.
- 13 5. I also spoke with my attorneys on the phone on at least 8 other occasions.
- 14 6. I also spent significant time reviewing the settlement documentation and discussing the
15 settlement with my attorneys.
- 16 7. In total, I estimate that I spent at least 22 hours related to the above mentioned tasks directly
17 working with my attorneys. I also spent at least another 4-5 hours of my own time gathering
18 evidence and outlining issues that I later shared with my attorneys.
- 19 8. When I decided to move forward with this case, I was counseled by my attorneys of the
20 potential stigma of being a Class Representative in a representative action, as this is a publicly
21 filed lawsuit.
- 22 9. I was also advised when I brought this case that had we lost, I could have been personally
23 liable for paying all of Defendants' costs. I was further advised this could be well into the tens
24 of thousands of dollars on this type of case.

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10. Despite these risks I was committed to achieving a settlement that would benefit all employees working for Defendants.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 14th day of August, 2025 at San Diego, California.

DocuSigned by:



Susana Jimenez