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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF LOS ANGELES**

TIANA GONZALES, individually, and on behalf
 of all others similarly situated, and on behalf of
 the State of California and other aggrieved
 persons; ADAN GALAVIZ, individually, and on
 behalf of the State of California and other
 aggrieved persons,

Plaintiffs,

v.

SO CAL SANTA FE LLC, a Delaware limited
 liability company; SO CAL GYMS LLC, a
 Delaware limited liability company; SO CAL
 COMPTON LLC, a California
 Corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 24STCV12882

*[Assigned for All Purposes to the Honorable
 Bruce G. Iwasaki, Dept. 14]*

**DECLARATION OF ADAN GALAVIZ IN
 SUPPORT OF PLAINTIFFS MOTION
 FOR PRELIMINARY APPROVAL OF
 CLASS ACTION AND PAGA
 SETTLEMENT**

Preliminary Approval Hearing:

Date: May 4, 2027

Time: 10:00 a.m.

Dept.: 11

Action Filed: May 22, 2024

DECLARATION OF ADAN GALAVIZ

I, Adan Galaviz, 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 So Cal Compton LLC (“Defendant”) as an overnight team member from approximately May 2024 to October 2024.

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 a named Plaintiff in this case and have brought representative claims under PAGA on behalf of the State of California and other aggrieved employees. I believe my experiences are similar to those of other hourly-paid, non-exempt employees of Defendant because we were subject to similar employment policies and practices.

5. I do not have any conflicts with the other aggrieved employees that would interfere with my ability to represent their interests or the interests of the State of California in connection with my PAGA claims.

6. My interests as a named Plaintiff are not adverse to the interests of the other aggrieved employees. I believe my interests are aligned with the other employees because we were subject to similar employment policies and practices.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

7. Further, when I decided to become involved in this lawsuit as a named Plaintiff and as a private attorney general for the State of California on behalf of other employees of Defendant and as a private attorney general for the State of California, I understood that I was not only seeking unpaid wages and penalties on behalf of myself, but also for other employees who worked for Defendant, and that by doing so, I would be delaying more immediate recovery available to me through the Labor Commissioner’s office.

8. I was also made aware that being a named Plaintiff and private attorney general in an

1 action filed on behalf of others would subject me to a stigma that is sometimes associated with those
2 who bring these kinds of lawsuits. I was aware that, as a class representative and private attorney
3 general, I might be responsible for some or all of Defendant's legal costs if the case was not
4 successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act
5 on behalf of the other employees and the State of California, but I was nervous about losing and
6 having a judgment filed against me for costs or losing job opportunities in the future.

7 9. I understood that there were risks involved in class and representative action lawsuits.
8 I understood that the lawsuit could continue for several years and require my services and attention
9 throughout the entire length of the lawsuit. I learned that even if we won at trial, the case could be
10 further delayed by appeals.

11 **Notoriety and Personal Difficulties Encountered**

12 10. As a named Plaintiff, I am publicly identified with this litigation. I understand that
13 having filed this lawsuit means that there is a permanent public record of my involvement in litigation
14 against my former employer. Exposing myself to this kind of publicity creates a risk for my future
15 career prospects because current and former employees of Defendant may move to different
16 companies within the industry or may know people at other companies within the industry who may
17 not wish to hire someone who sued his employer. Given this exposure, I understand there may be a
18 risk to my future career prospects.

19 **Amount of Time and Effort Spent and Duration of the Litigation**

20 11. I have always kept the best interests of the other hourly-paid, non-exempt employees
21 in mind while performing my duties as the named plaintiff in this case. I have been committed
22 throughout the course of this case to vigorously prosecuting this case on behalf of myself and the
23 other employees. I believe that I have demonstrated my ability to advocate for the interests of the
24 other hourly-paid non-exempt employees by initiating these lawsuits and have spent a substantial
25 amount of time and effort on this litigation. My work on this case has specifically included, among
26 other things, searching for and gathering my employment documents to provide to my attorneys,
27 providing information to my attorneys regarding my experiences working for Defendant, keeping in
28 regular contact with my attorneys regarding the status of the case, helping my attorneys prepare for

mediation, being on-call for my attorneys on the date of mediation in case questions or concerns arose during mediation, and participating in settlement discussions. After mediation, I remained actively involved by reviewing the settlement papers and contacting my counsel for updates. I estimate that since I retained my counsel, I have spent approximately 40 hours on the activities described above. And I estimate that I will spend an additional 3 hours assisting my attorneys through the approval process and staying up to date with the case through disbursement of the settlement checks.

Personal Benefit Received as a Result of the Litigation

12. Absent the requested service payment, the personal benefit I will receive is the same as all other employees. But unlike the other employees, who are only releasing the wage and hour claims asserted in the lawsuit, I have signed a general release of claims as to Defendant.

13. I will continue to actively participate in this lawsuit as necessary and will continue to make myself available to assist in this case moving forward as needed.

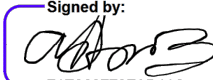
No Conflicts

14. I do not have any actual or potential conflicts of interest with Class Members or the proposed Settlement Administrator, ILYM Group, Inc.

15. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by this Settlement.

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

Executed on 8/24/2026, at Huntington Park, California.

Signed by:

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Adan Galaviz