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9 Class Counsel

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

12 DAIMEN WAGNER, on behalf of himself
13 and all "aggrieved employees" pursuant to
14 Labor Code § 2698 *et seq.*,

15 Plaintiff,

16 v.

17 PARK PLACE ASSET MANAGEMENT, A
18 CALIFORNIA LIMITED PARTNERSHIP, a
19 California limited partnership, BARCELONA
20 APARTMENTS INVESTORS, A
21 CALIFORNIA LIMITED PARTNERSHIP, a
22 California limited partnership, and DOES 1
23 through 10, inclusive,

24 Defendants.

Case No. 24CV013347

Assigned to Hon. Jill Talley, Dept. 23

CLASS ACTION

**DECLARATION OF DAIMEN WAGNER
IN SUPPORT OF UNOPPOSED MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND
UNOPPOSED APPLICATION FOR
APPROVAL OF ATTORNEYS' FEES
AND COSTS, CLAIMS
ADMINISTRATION FEES, AND CLASS
REPRESENTATIVE'S ENHANCEMENT
PAYMENT**

Date: April 3, 2026

Time: 9:00 a.m.

Dept.: 23

Complaint Filed: July 5, 2024

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DECLARATION OF DAIMEN WAGNER IN SUPPORT OF UNOPPOSED MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND UNOPPOSED APPLICATION FOR APPROVAL OF ATTORNEYS' FEES AND
COSTS, CLAIMS ADMINISTRATION FEES, AND CLASS REPRESENTATIVE'S ENHANCEMENT PAYMENT

1 I, DAIMEN WAGNER, hereby declare and state as follows:

2 1. I am the named Plaintiff in this lawsuit against Park Place Asset
3 Management, A California Limited Partnership, Barcelona Apartments Investors, A
4 California Limited Partnership (“Defendants”) and I submit this declaration in support
5 of Plaintiff’s Unopposed Motion for Final Approval of Class Action Settlement and
6 Plaintiff’s Unopposed Application for Attorneys’ Fees and Costs, Claims Administration
7 Fees, and Class Representative’s Enhancement Payment. I am a competent adult and
8 worked for Defendants as a non-exempt employee during the Class Period. I have
9 personal knowledge of the facts set forth herein, and if called as a witness to testify to
10 them, I could and would do so competently.

11 2. I contacted my current attorneys when I questioned the employment
12 practices of Defendants prior to commencing this lawsuit. I accepted the opportunity to
13 act as the Class Representative in a class action on behalf of other employees of
14 Defendants who I believed were being subjected to labor law violations. Although
15 presented with the opportunity, I did not pursue this case on an individual basis and
16 instead did so as a class action so that I could help other employees recover for what I
17 believed were Defendants’ illegal practices.

18 3. Specifically, I questioned Defendants’ policies of failing to pay all
19 minimum and overtime wages, pay wages at the correct rates of pay, provide legally
20 compliant meal and rest periods, pay all due upon separation of employment and failing
21 to provide accurate and complete wage statements. Through many discussions with my
22 lawyers, I learned these may be illegal practices and Defendants’ employees might have
23 recourse for them.

24 4. By bringing this lawsuit, and throughout its course, I have put the interests
25 of the class ahead of my own. I understood that I could possibly earn a small
26 enhancement payment if this case resolved itself favorably, but always knew that I could
27 also be responsible for paying Defendants’ attorneys’ fees and costs if it did not. My

1 goal in bringing this lawsuit was to obtain a recovery on behalf of the class, and even
2 more importantly, to put an end to what I believed were illegal practices on the part of
3 Defendants. I believe I have achieved both through this lawsuit and settlement.

4 5. I am very happy about the results of this litigation. I am satisfied that
5 Defendants is compensating class members for unpaid wages, penalties, and interest that
6 I believe we are due.

7 6. At the onset of this case, I spent time through numerous phone calls with
8 my attorney explaining what I understood to be the policies and procedures of
9 Defendants and how they were applied to me and others I worked with. During the
10 course of this litigation, up through and following the settlement process, I kept actively
11 involved with its status, tracking the status of the case and participating as much as
12 possible.

13 7. While I have not maintained detailed time records of my activities in
14 connection with this litigation, I believe that have spent a total of approximately 15
15 hours assisting my attorney with the preparation of this case, and doing work and
16 analysis independent from my attorney both before and during this case, including
17 conducting an independent investigation of the facts.

18 8. Before this litigation commenced, and throughout its course, I have spent
19 approximately 10 or more hours gathering, organizing, and reviewing documents and
20 information for this lawsuit. I sifted through many of my own documents and reviewed
21 information produced by Defendants as part of this case.

22 9. I have communicated with my attorney several times per month to track
23 my case's status. I have taken an active involvement in this matter throughout its course.

24 10. This lawsuit will almost certainly result in reputational harm to me. There
25 is a stigma associated with suing anyone, let alone your former employer. I will
26 probably be adversely affected when it comes to obtaining future employment –
27 employers who learn that I sued Defendants in a class action will likely avoid hiring me.

11. I do not believe that I have any conflicts with other members of the class. My interests in bringing this lawsuit – for Defendants to change their labor practices going forward and to compensate current and former employees – are the same as those of all other class members.

12. I also have a separate individual settlement with Defendants to settle claims related to wrongful termination.

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

Executed on 03 / 04 / 2026 at Sacramento , California.

D. Wayne

DAIMEN WAGNER