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Attorney for Plaintiff JANE EG DOE

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

JANE EG DOE, an individual,

Plaintiff,

vs.

EMPOWER MANAGEMENT, LLC, a
California corporation; L3 OASIS HOTEL, a
business entity of unknown form; KELLY
WOO, an individual; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 24STCV22311

CLASS ACTION

[Assigned for all purposes to the
Honorable Elihu M. Berle, Dept. 6]

**DECLARATION OF PLAINTIFF IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

DATE: June 24, 2026
TIME: 10:00 a.m.
DEPT: 6

Complaint Filed: August 30, 2024
Trial Date: None set yet

DECLARATION OF PLAINTIFF

I, ERIKA GONZALES, hereby declare as follows:

1. I am the named plaintiff in the above-entitled action, *Jane EG Doe vs. Empower Management, LLC, et al.* Los Angeles Superior Court Case No. 24STCV22311.

2. All of the facts stated in this declaration are based on my personal firsthand knowledge, except as to those matters stated on information and belief and as to those matters, I believe them to be true. If called as a witness, I could and would readily and competently testify to all matters stated in this declaration.

3. This declaration is filed in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement.

4. I was employed as a non-exempt hourly employee in the position of Housekeeper by Defendant Empower Management, LLC ("Defendant") from approximately May 18, 2022 until March 28, 2024.

5. I seek to be a class representative in this lawsuit. I understand that a class representative: (a) represents the interests of all members of the class in litigation to recover money damages or obtain injunctive relief for the class; (b) has claims that are typical of those of the class, thus involving common issues of law or fact; (c) acts as a fiduciary to the class, always considering the interests of the class just as he would consider his own interests and, in some cases, putting the interests of the class before his own interests; (d) actively participates in the lawsuit, as necessary; (e) may be required to travel to give such testimony; (f) recognizes and accepts that any resolution of the lawsuit, by dismissal or settlement, is subject to court approval and must be designed in the best interest of the class as a whole; (g) should follow the progress of the lawsuit and provide all relevant facts to the lawyers for the class; and (h) volunteers to represent many other people with similar claims and injuries because of the importance of the case and the necessity that all class members benefit from the lawsuit equally.

6. I understand that the members of the proposed class are similarly situated with respect to a common course of conduct, policy, or practice. I believe that, during my employment with Defendant, I was subjected to the same uniform policies, procedures, and

1 practices as other members of the proposed class with respect to, among other things, meal
2 periods, rest periods, and Defendant's payment of overtime wages.

3 7. In March of 2024, I retained Falchetti Law Firm, PC to represent me in this
4 action. Since that date, I have actively participated in this case. I have spent approximately 30
5 to 40 hours on this case, including, but not limited to, maintaining regular contact with my
6 attorneys, keeping myself informed of developments in the case, meeting with my attorneys,
7 searching for and producing relevant documents, making myself available to my attorneys,
8 preparing for and responding to questions from my attorney, assisting my attorney's efforts to
9 reach out to other witnesses, assisting and preparing for mediation, making myself available to
10 my attorneys during the mediation, participating in decisions concerning this case, including
11 settlement, and reviewing the settlement agreement. I estimate that I will spend an additional 2
12 hours on this case, including reviewing and discussing with my attorneys my declaration in
13 support of Plaintiff's motion for final approval and keeping myself informed of development in
14 the case up until final resolution.

15 8. I made sure that I understood everything that was going on in the case so I could
16 make the best informed decisions on behalf of the class and myself.

17 9. In agreeing to serve as the named plaintiff and Class Representative, I realized I
18 would be undertaking risks and giving up rights that other class members would not be facing.

19 10. Furthermore, as part of the Joint Stipulation of Class and Representative Action
20 Settlement and Release, after the final approval of this settlement, I may be releasing all of my
21 claims arising from my employment with Defendants if I am awarded a Class Representative
22 Incentive Payment Award. This release is not intended to release claims in a separate FEHA-
23 related matter that has already been resolved and for which payment is still pending. I
24 understand that this release is a broader release than the release that applies to the other class
25 members.

26 11. Moreover, in bringing this action as a class action, I agreed to postpone the
27 prosecution of my individual wage and hour Labor Code claims against Defendant.

28 12. Yet, despite these risks and my waiver of rights, I felt so strongly about standing

1 up for the rights of my fellow coworkers that I decided to bring and participate in this lawsuit.

2 13. I believe that the requested \$5,000.00 Class Representative Service Award for
3 serving as a class representative is reasonable given the substantial time and effort I have
4 expended on behalf of the class and the risks I faced in serving as a named plaintiff and class
5 representative. The class members will receive the opportunity to participate in the settlement
6 and to recover payment for the alleged wage and hour violations. Because of my efforts, each
7 class member does not have to expend his or her own time and resources to pursue legal
8 remedies individually. This action would not have been possible without my active
9 participation and my willingness to place myself at risk for the sake of the other class members.

10 14. I recognize that without my efforts, this lawsuit may not have been brought on
11 behalf of Defendants' non-exempt employees. Throughout the litigation, I did my best to
12 represent the class and to look out for its interests. As a class representative, I will always
13 consider the interests of class members just as I would consider my own interests, and I
14 understand that in some situations I must put the interests of class members before my own
15 interests. I will continue to actively participate in the lawsuit, as necessary. I recognize and
16 accept that any resolution of this lawsuit is subject to court approval and must be in the best
17 interest of the class as a whole.

18 15. I do not believe that I have any conflict with any other class members or interests
19 that are adverse to the other class members.

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

22
23 Executed on _____ at Cathedral City, California.

24 _____
25 ERIKA GONZALES
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