

LIPELES LAW GROUP, APC

KEVIN A. LIPELES (SBN: 244275)

kevin@kallaw.com

THOMAS H. SCHELLY (SBN: 217285)

thomas@kallaw.com

JASMINE BADAWI (SBN: 335433)

jasmine@kallaw.com

1060 Aviation Blvd., Suite 100

Hermosa Beach, CA 90254

Telephone: (310) 322-2211

Fax: (310) 322-2252

ATTORNEYS FOR PLAINTIFFS MARC DAVILA AND MADELEINE GRANT,
THE LWDA, AND THE AGGRIEVED EMPLOYEES

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF RIVERSIDE

MARC DAVILA, an individual, and
MADELEINE GRANT, an individual

Plaintiffs,

vs.

WEST COAST TANNING DBA PALM
BEACH TAN, a California corporation; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: **CVR12404266**

ASSIGNED FOR ALL PURPOSES TO:
HON. HAROLD W. HOPP

**DECLARATION OF MADELEINE GRANT IN
SUPPORT OF PLAINTIFFS' MOTION TO
APPROVE PAGA SETTLEMENT**

Date: March 19, 2026

Time: 8:30 AM

Dept.: 1

Action filed: July 19, 2024

Trial Date: None Set

I, Madeleine Grant, declare as follows:

1. The facts set forth herein are true based on my own personal knowledge, and if
called upon to testify thereto, I could and would competently do so under oath.

2. I submit this declaration in support of Plaintiffs' motion for the Court to approve the
PAGA Settlement in this action. This declaration includes the nature of my participation in this
action.

3. I am one of the named plaintiffs in this action. On or around July 19, 2024, my
attorneys filed, on behalf of the other named plaintiff, Marc Davila, a Class Action Complaint

entitled *Marc Davila v. West Coast Tanning dba Palm Beach Tan*, Case No. CVR12404266, in the Superior Court of California, Riverside County, on behalf of Marc Davila, and all others similarly situated. On or about February 25, 2025, my attorneys filed a First Amended Complaint (“FAC”) adding myself as a Plaintiff, dismissing the class claims and alleging a single cause of action for penalties pursuant to PAGA. On or about October 1, 2025, my attorneys filed an amended PAGA letter with the LWDA concerning claims against Heidi Schultz. On or about January 29, 2026, my attorneys filed a Second Amended Complaint (“SAC”) adding Heidi Shultz as a Defendant.

4. I worked for West Coast Tanning, Corporation (dba Palm Beach Tan, LLC) and Heidi Shultz (“Defendants”) as a Tanning/Sales Consultant from in or around November 7, 2022 and continuing to August 1, 2023. As a Tanning/Sales Consultant, my job responsibilities included checking clients in for their appointments and soliciting them to sign up for memberships.

5. In my Tanning/Sales Consultant capacity for Defendants, I was required to work in excess of 8 hours per day and 40 hours per week due to off the clock work. However, Defendants failed to pay me my overtime wages owed. Defendants also failed to pay me minimum wages. Further, Defendants failed to afford me compliant meal/rest breaks. Additionally, Defendants did not reimburse me for business expenses, failed to provide me with suitable seating and pay sick pay wages.

6. I understand that, as a PAGA Representative, I have a duty to look out for and protect the interests of the Aggrieved Employees as a whole. I do not believe, nor do I have any reason to believe, that my interests in this lawsuit are in conflict or in any way antagonistic to the interests of those of my fellow Aggrieved Employees.

7. As one of the named plaintiffs in this action, I provided significant assistance to PAGA Counsel in this case. I spent approximately 25-30 hours relating to this case. Among other things, I participated in several lengthy interviews and phone conferences over a period lasting several months, searched for and produced a significant number of relevant documents, reviewed pleadings in the case, reviewed documents and data provided by Defendants, kept in contact with my attorneys regarding the status of the case, and remotely attended the all-day mediation on May 27, 2025. My efforts were instrumental in securing the favorable terms of the PAGA Settlement Agreement, which will provide

monetary compensation to a Class of approximately 624 Aggrieved Employees.

8. It is my understanding that the Enhancement Payment is intended to compensate me, as one of the PAGA representatives, for all the work I did on behalf of the Aggrieved Employees and the State, and in order to confer a benefit to the Aggrieved Employees and the State. I believe I did confer a benefit to the Aggrieved Employees and the State by bringing this lawsuit, in that, this lawsuit resulted in a Gross PAGA Settlement Amount (“GPSA”) of \$125,000.00. The settlement will result in the Aggrieved Employees receiving proportional disbursements from the settlement as statutory penalties that they are entitled to for the wage and hour violations alleged in the SAC. Therefore, I believe I should be fairly compensated for my time and effort. I believe the Enhancement Payment in the amount of \$2,500.00 is a reasonable and fair amount of compensation given my extensive participation and the amount of time and energy I expended in pursuit of this lawsuit.

9. In participating as one of the named plaintiffs, I was exposed to substantial risk, including, at the very least, reputational risk, and at most, significant financial risk, because had I lost, I could have been ordered to pay Defendants’ costs.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on Feb 11, 2026, at 2/11/2026, California.


Madeleine Grant (Feb 11, 2026 12:25:47 GMT+11)
Madeleine Grant