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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

GEOFFREY BRAND, individually, and on
behalf of all others similarly situated,

Plaintiff,

v.

PACIFIC CITY OPERATIONS, LLC DBA
PASEA HOTEL & SPA, a limited liability
company; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 30-2024-01415965-CU-OE-CXC
Assigned to Hon. William Claster, Dept. CX-
101

Complaint Filed: July 31, 2024
FAC Filed: November 27, 2024
Trial Date: Not set

PAGA REPRESENTATIVE ACTION

**DECLARATION OF GEOFFREY
BRAND IN SUPPORT OF PLAINTIFF'S
MOTION TO APPROVE PAGA
SETTLEMENT**

DECLARATION OF GEOFFREY BRAND

I, Geoffrey Brand, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

2. I am the named Plaintiff in this action brought pursuant to the Private Attorneys General Act ("PAGA") and submit this declaration in support of Plaintiff's Motion to Approve PAGA Settlement. Because of the time, effort, and risks I undertook in serving as the PAGA representative, I respectfully request that the Court approve the \$1,000.00 Enhancement Award provided for in the Settlement.

3. I am a former employee of Pacific City Operations, LLC dba Pasea Hotel & Spa ("Defendant"). I worked for Defendant from approximately June 2024 to approximately July 2024 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to Defendant's policies and practices that have been alleged as unlawful in the complaint.

4. I filed this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, I was not provided all of my meal and rest breaks, and I was not reimbursed for all business expenses. While working for Defendant, my coworkers and I were asked to work long hours because of the amount of work, sometimes without taking meal and rest breaks and without receiving compensation for all hours worked. I also observed my co-workers working long hours without taking breaks. Furthermore, my co-workers and I were not reimbursed for all of our business expenses.

5. By representing other aggrieved employees in this lawsuit, I hoped that I might be able to change Defendant's policies to better protect the working conditions of my co-workers. I also understood it was my duty as the PAGA Representative to represent the State of California and other aggrieved employees, know about the lawsuit, help my attorneys, and keep updated on the case.

6. Prior to commencing this case, I provided Wilshire Law Firm, PLC with a detailed account of the facts related to my employment with Defendant. Additionally, I provided my counsel with documentation in the form of pay statements that applied to my employment with

1 Defendant. Based on my conversations, my attorneys and I were able to identify instances when I
2 was not paid correctly.

3 7. I have invested a lot of personal time and energy while this lawsuit has been
4 pending. I made it a priority to be actively involved because I wanted to do everything I can to
5 assist my attorneys in prosecuting this case. I regularly communicated with my attorneys and their
6 staff to discuss updates on the case and to provide my attorneys with additional information.

7 8. I spent multiple hours looking for documents that my attorneys asked me to provide
8 to help this case.

9 9. I also made myself available during the mediation for this case and I kept in regular
10 contact my attorneys before and after the mediation to ensure that any questions the attorneys had
11 could be answered.

12 10. I also reviewed documents filed in this case, including the settlement-related
13 documents.

14 11. My individual claims were resolved separately. I understand that the settlement now
15 before the Court concerns only the representative PAGA claims brought on behalf of the State of
16 California and the Aggrieved Employees.

17 12. I believe the settlement is fair, reasonable, and adequate in view of PAGA's
18 purposes and the risks and delay of continued litigation. I am grateful that I had the opportunity to
19 represent the State of California and the Aggrieved Employees in this lawsuit and help recover
20 civil penalties through settlement.

21 13. I estimate that I spent at least 30 hours if not more on this case since I first contacted
22 Wilshire Law Firm, PLC.

23 14. I did not make the decision to file this representative action lightly. I was concerned
24 by the attention a lawsuit, and especially a representative action, would attract. My name would
25 be associated with a lawsuit that I filed against my former employer, and I am mindful that future
26 employers might find out that I sued a former employer, which could hurt my employability. In a
27 competitive job market, this factor may weigh heavily against me.
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15. Standing up for myself and the rights of others was not an easy decision, and I am relieved that this case is coming to an end.

16. I respectfully request that the Court approve the \$1,000.00 Enhancement Award. Other than my separately resolved individual claims, I am receiving no compensation beyond what is provided for in the representative PAGA settlement. Based on my involvement in this case and the benefits provided to Defendant's employees, I believe I helped represent workers who may have been too afraid to come forward on their own.

17. Although I continue to fear that employers may find out that I participated in this lawsuit and hold it against me, I felt that important rights were at stake that hurt myself and other employees.

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

Executed on 4/1/2026 at Long Beach, California.

DocuSigned by:
Geoffrey Brand
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Geoffrey Brand