

John G. Yslas (SBN 187324)
jyslas@wilshirelawfirm.com
Eugene Zinovyev (SBN 267245)
eugene.zinovyev@wilshirelawfirm.com
John Brown (SBN 233605)
john.brown@wilshirelawfirm.com
Gabriella Solé (SBN 346164)
gabriella.sole@wilshirelawfirm.com
Emily K. Borman (SBN 303180)
emily.borman@wilshirelawfirm.com
Courtney M. Miller (SBN 327850)
courtney.miller@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
660 S. Figueroa Street, Sky Lobby
Los Angeles, California 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff

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

AGUILA TOBIAS ACOSTA, individually, and
on behalf of all others similarly situated,

Plaintiff,

v.

LA PLAYA HOTEL GROUP, LLC, a Delaware
limited liability company; HOTEL CARMEL
GROUP, LLC, a Delaware limited liability
company; CASA LOMA BEACH HOTEL, LLC,
a Delaware limited liability company; NORTH
COAST GROUP, LLC, a Delaware limited
liability company; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: 25CV003941

*[Assigned for All Purposes to the Hon. Hon.
Thomas W. Wills, Dept. 15]*

**DECLARATION OF AGUILA TOBIAS
ACOSTA IN SUPPORT PLAINTIFF’S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Action Filed: September 30, 2024

DECLARATION OF AGUILA TOBIAS ACOSTA

I, Aguila Tobias Acosta, 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 Defendant La Playa Hotel Group, LLC (“La Playa Hotel Group”) as an hourly-paid non-exempt employee from approximately March 2019 to approximately January 2024. I worked for La Playa Hotel Group as a bartender.

3. Based on my experience and knowledge of La Playa Hotel Group’s wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on behalf of myself as well as other hourly-paid non-exempt employees of La Playa Hotel Group.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to those of other hourly-paid non-exempt employees of La Playa Hotel Group. I believe we were all subject to the same employment policies and practices while working for La Playa Hotel Group.

5. I do not have any conflicts with other hourly-paid non-exempt employees of La Playa Hotel Group that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid non-exempt employees at La Playa Hotel Group.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by La Playa Hotel Group’s company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by La Playa Hotel Group.

7. I have always kept the best interests of the other hourly-paid non-exempt employees in mind while performing my duties as the named plaintiff in this case. I have been committed throughout the course of this case to vigorously prosecuting this case on behalf of myself and the

other employees. I believe that I have demonstrated my ability to advocate for the interests of the other hourly-paid non-exempt employees by initiating this lawsuit, providing documents and information to my attorneys, keeping in regular contact with my attorneys regarding the status of the case, meeting with my attorneys regarding the claims, and reviewing the settlement agreement to make sure it was fair.

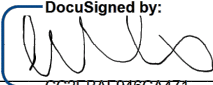
8. I will continue to actively participate in this lawsuit as necessary and will continue to make myself available to assist in this case moving forward as needed.

9. I do not have any actual or potential conflicts of interest with Class Members or the proposed Settlement Administrator, Phoenix Settlement Administrators.

10. 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 12/8/2025, at Salinas, California.

DocuSigned by:

 CC2EBAF946CA471...

Aguila Tobias Acosta