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Attorneys for Plaintiff and the Proposed Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

MARIA SANDOVAL NUNEZ, an individual,
on behalf of herself and others similarly
situated,

PLAINTIFF,

v.

MERRITT HOSPITALITY, LLC; and DOES 1
thru 50, inclusive,

DEFENDANTS.

CASE NO. 20STCV07198

[Case Assigned for All Purposes to Honorable
Maren Nelson in Dept. 17]

**DECLARATION OF MARIA
SANDOVAL NUNEZ IN SUPPORT OF
PRELIMINARY APPROVAL OF CLASS
SETTLEMENT**

Date: November 23, 2021

Time: 9:00 a.m.

Dept.: 17

Complaint Filed:	February 25, 2020
FAC Filed:	May 4, 2020
SAC Filed:	February 11, 2021
Trial Date:	None Set

DECLARATION OF MARIA SANDOVAL NUNEZ

I, Maria Sandoval Nunez, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and the named Plaintiff in the above-captioned matter. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant MERRITT HOSPITALITY, LLC ("Defendant"). I worked for Defendant as an hourly non-exempt employee from approximately August 15, 2018 until June 2, 2021, earning approximately \$17 per hour. I was a front desk clerk.

3. I brought this lawsuit, on behalf of myself and all other Proposed Settlement Class Members, against Defendant because I believe that Defendant did not pay overtime at the appropriate rate of pay, did not provide all required lawful meal and rest breaks, did not provide accurate itemized wage statements, did not pay all wages due at the time of termination or resignation, and did not provide adequate seating at the front desk area. I believe these alleged violations affected me and other employees.

4. I understand that I am representing other employees and I believe that I am able to represent them well.

5. I first researched experienced attorneys who are very experienced with these types of lawsuits. Once retained, I compiled relevant documents from my employment to assist my attorneys in litigating this case. I worked with my attorneys to develop the facts and legal claims in this lawsuit. The class action lawsuit was filed on February 25, 2020.

6. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the settlement as needed. Additional work in connection with this matter includes providing information to my attorneys regarding my employment with Defendant; staying in regular contact with my attorneys to discuss the status of the case; responding promptly to my attorneys' various communications regarding this matter; assisting my attorneys in preparing for mediation and being available that day as needed, and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best

interests of the Proposed Settlement Class Members.

7. I estimate the total time spent in connection with this matter so far is approximately 30-40 hours.

8. I have worked to actively represent the other Proposed Settlement Class Members and their interests, and I believe that I have always kept the Proposed Settlement Class Members interests at heart in this litigation.

9. I am prepared to continue assisting with this litigation and am committed to achieving the best possible results for the members of the settlement class.

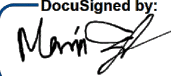
10. I believe that the class action settlement obtained on behalf of the Proposed Settlement Class Members is fair and reasonable in light of the issues involved in this case. As mentioned above, I reviewed and discussed the Settlement Agreement with my attorneys and asked them questions about it to ensure that I understood its terms and what it would mean for all of the class members.

11. I am not aware of any conflicts of interest that prevent me from being confirmed as Named Plaintiff in this Action. I am not related in any way to my attorneys or to any other member of the firm that is representing me. I have no business dealings or other involvement beyond this lawsuit and this representation. I have not been promised any money or inducement to serve as Named Plaintiff in this Action.

12. I am prepared to continue to assist with this litigation as needed to see this process through final approval.

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

Executed this 17 day of September, 2021 at Los Angeles, California.
(City)

DocuSigned by:

9675F46279534B3...
Maria Sandoval Nunez

(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On October 27, 2021, I served all interested parties in this action the following documents described as: **DECLARATION OF MARIA SANDOVAL NUNEZ IN SUPPORT OF PRELIMINARY APPROVAL OF CLASS SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Jeffrey P. Fuchsman
jfuchsman@brgslaw.com
Ballard, Rosenberg, Golper & Savitt, LLP
15760 Ventura Blvd., 18th Floor
Encino, CA 91436

☐ **(BY MAIL)** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage fully prepaid at Encino, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ **BY ELECTRONIC MAIL THROUGH CASE ANYWHERE:** On interested parties set forth on the attached service list.

☒ **BY ELECTRONIC SERVICE:** I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 27, 2021, at Woodland Hills, California.



Michelle A. Tanzer