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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

DENISE FLORES and AMANDA HICKS,
individuals, on behalf of themselves, and on
behalf of all persons similarly situated,

Plaintiffs,

v.

J & P ASSET MANAGEMENT INC., an Ohio
Corporation; J&P HOSPITALITY
MANAGEMENT, LLC, an Ohio Limited
Liability Company; and DOES 1-50, Inclusive,

Defendants

Case No: CIVSB2407059

**DECLARATION OF DENISE FLORES IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA ACTION SETTLEMENT**

Date: February 18, 2027
Time: 8:30am

Judge: Hon. Michael Sachs
Dept.: S28

1 I, DENISE FLORES, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am the named Plaintiff in the above
4 wage and hour class action filed against J&P Asset Management Inc., and J&P Hospitality
5 Management, LLC (“Defendants”).

6 2. This declaration is being submitted in support of Plaintiffs’ Motion for Preliminary
7 Approval of Class and PAGA Action Settlement.

8 3. I believe that I am, have been and will continue to represent the interests of the class
9 fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking
10 to represent.

11 4. I worked for Defendants as a non-exempt employee, paid on an hourly basis in addition
12 to non-discretionary bonuses in San Bernardino county between June 2020 to March 2023. At all times
13 during my employment, I was paid on an hourly basis in addition to earning non-discretionary bonuses
14 and was entitled to legally compliant meal and/or rest periods, and minimum, regular and overtime
15 wages for all hours worked. Throughout my employment, I was subject to Defendants’ written policies
16 and procedures contained in, among other documents, the “Team Member Employee Handbook.”

17 5. Generally, my lawsuit claims that Defendants failed to properly calculate the regular
18 rate of pay for purposes of overtime, failed to provide legally compliant meal and rest breaks, failed
19 to pay for all time worked, failed to reimburse for required business expenses, failed to provide
20 accurate itemized wage statements, and failed to timely pay wages due upon separation of
21 employment.

22 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
23 to represent because I was subject to the same alleged unlawful employment policies and practices at
24 issue in this action, including but not limited to, Defendants’ failure to include commissions and non-
25 discretionary bonuses into the regular rate of pay for the purposes of overtime, failure to provide meal
26 breaks and rest breaks, and failure to reimburse employees for mandatory business expenses, failure
27 to issue accurate itemized wage statements, and failure to pay wages when due. Factually, Defendants’
28

1 policies and practices apply class wide, and Defendants' liability can be determined by facts common
2 to all members of the Class.

3 7. Further, there is no conflict between my interests and the interests of the class that I am
4 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that
5 I was injured by the same company-wide policies and practices to which the proposed Class was
6 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
7 of the Class by initiating this litigation, undertaking extensive class document evaluation, and
8 evaluating the proposed settlement to assure that it is fair.

9 8. I understood at the time that I filed this action, that as a Class Representative, I owed a
10 duty to the putative class members to faithfully prosecute this action with their best interests at the
11 forefront of every decision. I understood that I could not make any decision in this action for the sole
12 benefit of my personal interest. I understood that in executing this duty, I might have been asked to
13 sacrifice my personal best interests for the benefit of the interests of the putative class members.
14 Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible
15 relief for my former co-workers for what I perceived to be Defendants' unlawful wage and hour
16 practices. I believe that I faithfully executed the duties of a Class Representative throughout this
17 litigation and will continue to do until this litigation is fully and finally resolved.

18 9. I believe that the proposed settlement before the Court is fair, reasonable and adequate,
19 and made in the best interest of the Settlement Class Members. Consequently, I respectfully, and
20 humbly, I ask the Court to grant preliminary approval of the Settlement and all of its terms.

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10. Further, I support my attorneys' application for Attorneys' Fees in the amount of \$59,400.00 for attorneys' fees (one-third of the Gross Settlement Amount) and *up to* \$40,000.00 for reimbursement of actually incurred litigation expenses. I understand that the attorneys' fees portion of the Attorneys' Fees shall be divided 50% to JCL Law Firm, APC, and 50% to Zakay Law Group, APLC, and I expressly consent to this division of fees.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 09/11/2026 (Date), in Yucaipa (City), California.

By: Denise Flores (Sep 11, 2026 10:44:00 PDT)
DENISE FLORES