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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF SAN DIEGO**

JUNE GARCIA, an individual, on behalf of  
herself and on behalf of all persons similarly  
situated,

Plaintiff,

v.

HILTON RESORTS CORPORATION, a  
Delaware corporation; HILTON GRAND  
VACATIONS COMPANY, LLC, a Delaware  
limited liability company; HILTON GRAND  
VACATIONS MANAGEMENT, LLC, a  
Nevada limited liability company; and DOES  
1-50, Inclusive,

Defendants.

Case No. 37-2023-00024664-CU-OE-CTL

Action Filed: June 13, 2023

**DECLARATION OF JUNE GARCIA IN  
SUPPORT OF PLAINTIFF'S MOTION FOR  
FINAL APPROVAL OF CLASS ACTION  
AND PAGA SETTLEMENT**

Date: July 25, 2025

Time: 10:30 a.m.

Judge: Hon. Loren G. Freestone

Department: C-64

1 I, JUNE GARCIA, 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 HILTON RESORTS CORPORATION; HILTON GRAND  
5 VACATIONS COMPANY, LLC; and HILTON GRAND VACATIONS MANAGEMENT, LLC  
6 (hereinafter "Defendants").

7  
8 2. This declaration is being submitted in support of Plaintiff's motion for Final Approval of  
9 Class Action and PAGA Settlement.

10 3. I filed the lawsuit in June of 2023. I filed the case on behalf of myself and all current and  
11 former employees of Defendants who worked for Defendants at the Marbrisa location at any time  
12 during the period beginning June 13, 2019 through June 13, 2024 ("Class Period").

13 4. I worked for Defendants in San Diego County from 2012 to June of 2022.

14 5. I filed the case because I believed the Defendants violated my rights as an employee as  
15 well as the rights of other employees who worked for Defendants.

16 6. Before I initiated the case as the plaintiff and Class Representative, I spoke at length  
17 with my attorneys. We discussed my work experience and how company policies were applied to me  
18 and other employees. I provided the attorneys with documents they requested. We reviewed the  
19 documents together and asked and answered many questions regarding my experience working for  
20 Defendants, the litigation process, and about class actions generally.

21 7. During these conversations, I learned about my responsibilities as the plaintiff in the  
22 lawsuit and as the proposed Class Representative. I understood that pursuing this action as a class action  
23 rather than merely seeking my individual claims substantially increased the risk to me. Those risks  
24 included the possibility of being held liable for Defendants' attorneys' fees and costs in a complex class  
25 action if I lost the case. I also understood that as the Class Representative, I would be under increased  
26 scrutiny by the attorneys and the Court because I needed to prove that I was an adequate class  
27 representative. Further, I understood that I would lose some autonomy over my individual claims, that  
28 I could not make decisions for my sole benefit, and that I needed to make every litigation decision with  
the best interests of the Settlement Class in mind.

1           8.       I also understood that pursuing this litigation created a very public record of my  
2 grievances with Defendants which produced the risk that a future employer could hold it against me  
3 that I sued a former employer.

4           9.       I also knew that I was making a sacrifice in that I could have pursued my claims only on  
5 an individual basis, likely obtaining a recovery greater than the portion of the class settlement I stand  
6 to receive from this settlement. My attorneys explained to me that the net settlement value of my  
7 individual claims may be greater than my ultimate recovery from the net class settlement amount.

8           10.      Notwithstanding these risks and sacrifices, I decided to go through with the case because  
9 I believed violations occurred and most employees would not know what their rights are and even if  
10 they did, they would be apprehensive to file a lawsuit against their employer for fear of retaliation.

11          11.      During the lawsuit I communicated on a regular basis with my attorneys. I reviewed  
12 status updates from my attorneys and court filings on a regular basis, and spoke to my attorneys on the  
13 phone, because I wanted to keep up with developments in the case, which I understood was one of my  
14 duties as a class representative.

15          12.      **Review and Approval of Settlement:** A mediation was held on June 13, 2024. Even  
16 though I did not attend, I was available by telephone to speak with my attorneys and did speak with  
17 them regarding the mediation before it took place, as well as during the mediation itself. I also spoke  
18 with my attorneys after the mediation. I understood that the parties reached a settlement after both sides  
19 agreed to a Mediator's proposal which was subsequently memorialized in the form of a Memorandum  
20 of Understanding. I spoke with my attorneys about the proposed settlement and I was very satisfied  
21 with the terms of the settlement that was agreed to by the parties. When the settlement papers were  
22 ready, I again spoke with my attorneys and reviewed the settlement agreement, which I signed on  
23 September 16, 2024.

24          13.      **Participation:** Since I retained Class Counsel nearly three years ago, I have been actively  
25 involved with this class action lawsuit performing the duties described above. While I did not keep  
26 formal time records, I was in regular contact with my attorneys, reviewed important court filings, and  
27 spent considerable time on the issues presented during the litigation and in the settlement process. I  
28 estimate that I spent approximately 20 to 30 hours working on this case.

14. Also, my attorneys explained to me that the settlement process involved a two-step review by the Court to determine whether the settlement was fair before ordering that the settlement be funded and paid. I knew this process also involved notifying all class members of the settlement terms and of their rights to make a claim for their settlement share, to opt out of the settlement or to object to the settlement.

15. Ultimately, I believe I did the right thing in pursuing this case on behalf of the class members who now stand to receive substantial monetary payments as a result of this case and settlement. I also believe that the requested Class Representative Enhancement Award in the amount of \$10,000.00 from the settlement is fair compensation for the (1) the general release I executed, (2) the work I performed, (3) the sacrifices made not pursuing this case individually, and (4) the risks I undertook.

16. In light of all the time and effort I have spent on this case, the sacrifice I have made, the risks I undertook by suing a former employer, the exposure to being responsible for paying Defendants' costs in the event we lost the case, and in light of the size of the settlement, I believe the request for \$10,000.00 award is fair and reasonable.

17. Further, I support my attorneys' application for a Class Counsel Award in the amount of up to \$145,000.00, plus costs and expenses of up to \$30,000.00 for reimbursement of actually incurred litigation expenses.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 06/26/2025, in San Marcos, California

By: JUNE GARCIA  
JUNE GARCIA