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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

ALAA GADO KANA, an individual, on behalf
of himself, and on behalf of all persons similarly
situated,

Plaintiff,

v.

DAVIDSON HOTEL COMPANY, LLC; a
Delaware limited liability company; DHC SD
HOLDINGS LLC, a Delaware limited liability
company; and DOES 1-50, Inclusive,

Defendants.

Case No. 24CU018187C

**DECLARATION OF ALAA GADO KANA IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: April 17, 2026

Time: 10:30 a.m.

Judge: Hon. Carolyn M. Caietti

Dept.: C-70

1 I, ALAA GADO KANA, 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 lead named Plaintiff in the
4 above wage and hour class action filed against Defendant DAVIDSON HOTEL COMPANY, LLC and
5 DHC SD HOLDINGS LLC (hereinafter “Defendants”).

6 2. This declaration is being submitted in support of Plaintiff’s motion for Preliminary
7 Approval of Class Action and PAGA 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 have been employed by Defendants since October 2008, as a non-exempt employee.
12 At all times during my employment, I was denied legally compliant meal and rest periods, minimum
13 wages and overtime compensation. Throughout my employment, I was subject to Defendants’ written
14 policies and procedures contained in, among other documents, the Employee Handbook.

15 5. Generally, my lawsuit claims that Defendants failed to provide compliant meal and rest
16 periods, failed to pay for all time worked, failed to pay overtime at the correct regular rate of pay,
17 failed to furnish accurate itemized wage statements, failed to reimburse for mandatory business
18 expenses, failed to pay all wages upon separation, and violations of the Private Attorneys General Act
19 (“PAGA”).

20 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
21 to represent because I was subject to the same alleged unlawful employment policies and practices at
22 issue in this action, including but not limited to, Defendants’ failure to provide complaint meal and
23 rest periods, failure to pay overtime and meal period premiums at the correct regular rate of pay, failure
24 to reimburse for mandatory business expenses, failure to furnish accurate itemized wage statements,
25 failure to pay for all hours worked, and failure to pay all wages when due. Factually, Defendants’
26 policies and practices apply class wide, and Defendants’ liability can be determined by facts common
27 to all members of the Class.
28

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

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

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

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed 03/20/2026, at San Diego, (City/Location) California.

By: Alaa Kana
Alaa Kana (Mar 20, 2026 05:58:27 PDT)

ALAA GADO KANA