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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

LAN HO, an individual, on behalf of herself,
and on behalf of all persons similarly situated,

Plaintiff,

v.

MHF MV MANAGER VI LLC a Delaware
limited liability company; MHF MV
OPERATING VI LLC dba COURTYARD
SAN DIEGO MISSION VALLEY /HOTEL
CIRCLE, a Delaware limited liability company;
MHF MV VI LLC, a Delaware limited liability
company; and DOES 1-50, Inclusive,

Defendant.

Case No. 37-2024-00023005-CU-OE-CTL

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

Date: February 27, 2026

Time: 9:00 a.m.

Judge: Hon. Euketa Oliver

Dept.: C-75

1 I, LAN HO, 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 a lead Plaintiff in the above wage
4 and hour class action filed against Defendants MHF MV Manager VI LLC ("Defendant MHF
5 Manager"), MHF MV Operating VI LLC dba Courtyard San Diego Mission Valley/Hotel Circle
6 ("Defendant MHF Operating"), and MHF MV VI LLC ("Defendant MHF") (collectively,
7 "Defendants").

8 2. This declaration is being submitted in support of Plaintiffs' motion for Preliminary
9 Approval of Class Action and PAGA Settlement.

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

13 4. I was employed by Defendants from September 2019 through October 2023, as a non-
14 exempt employee. At all times during my employment, I was denied legally compliant meal and rest
15 periods, minimum wages and overtime compensation. Throughout my employment, I was subject to
16 Defendants' policies and procedures.

17 5. Generally, my lawsuit claims that Defendants failed to pay for all time worked, failed
18 to properly calculate the regular rate of pay for purposes of overtime, meal period premiums and
19 redeemed sick pay, failed to provide compliant meal and rest periods, failed to reimburse necessary
20 business expenses, failed to furnish accurate itemized wage statements, and failed to pay all wages
21 upon separation.

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 pay for all time worked, failure
25 to properly calculate the regular rate of pay for purposes of overtime, meal period premiums and
26 redeemed sick pay, failure to provide compliant meal and rest periods, failure to reimburse necessary
27 business expenses, failure to furnish accurate itemized wage statements, and failure to pay all wages
28

1 upon separation. Factually, Defendants' policies and practices apply class wide, and Defendants'
2 liability can be determined by facts common 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 discovery, and evaluating the
8 proposed settlement to assure that it is fair.

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

21
22 I declare under the penalty of perjury under the laws of the State of California that the foregoing
23 is true and correct. Executed 01/27/2026, at Chula Vista, California.

24
25
26 By: 
Lan Ho (Jan 27, 2026 13:42:09 PST)
27 LAN HO
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