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7 individually, and on behalf of all other similarly situated employees

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9 SUPERIOR COURT OF STATE OF CALIFORNIA

10 FOR THE COUNTY OF ORANGE

11
12 JUAN MANUEL PARRA CHAVEZ, as an
13 individual and on behalf of other similarly
situated employees,

14 Plaintiff,

15 vs.

16 HILTON RESORTS CORPORATION, a
California corporation, HILTON
17 RESERVATIONS WORLDWIDE, LLC, a
California corporation, HILTON HOTEL
18 EMPLOYER LLC, a California corporation,
19 and HILTON MANAGEMENT, LLC, a
California corporation, and DOES 1-50,
20 inclusive,

21 Defendants.
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Case No.: 30-2022-01248249-CU-OE-CXC

Assigned for all purposes to: Hon. David A.
Hoffer

**DECLARATION OF PLAINTIFF JUAN
MANUEL PARRA CHAVEZ IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Date: August 29, 2025

Hearing Time: 10:00 a.m.

Department: CX103

Reservation ID: 74578939

1 **DECLARATION OF JUAN MANUEL PARRA CHAVEZ**

2 I, Juan Manuel Parra Chavez, declare as follows:

3 1. I am over the age of eighteen and have personal knowledge of everything stated
4 below and could competently testify to these facts if sworn.

5 2. I submit this Declaration in support of the motion for preliminary approval of class
6 action settlement and class representative enhancement fee.

7 3. I worked for Defendants. I worked in Housekeeping, where I experienced the Labor
8 Code violations alleged in this action, including, but not limited to, not being provided with meal
9 periods and rest breaks, and working off the clock...

10 4. After consulting with a law firm, I decided to file a class action and Private Attorney
11 General Action claim. In agreeing to serve as a named Plaintiff and Class Representative, I realized
12 I would be undertaking risks and giving up rights that other class members would not be facing. In
13 addition to having to pay my own litigation costs, I realized that I could be responsible for paying
14 the Defendant's litigation costs if we did not win at trial. Despite these risks, I felt strongly enough
15 about pursuing this matter that I decided to bring and participate in this lawsuit.

16 5. Throughout this case, I was required to appear at my attorneys' office, answering
17 questions during several interviews by my attorney and his staff either in person or via telephone
18 related to the case, including regularly conferring with my lawyers and discussing strategies for
19 prosecuting the claims, and locating and submitting documents to my attorney in support of the
20 claims.

21 6. I remained involved and provided information and details about Defendants'
22 practices and policies in support of the class claims so that the claims could be maximized for the
23 class members. Through the litigation I made myself available to complete the settlement agreement,
24 finalize the terms of the settlement agreement and execute the settlement agreement.

25 7. In this litigation, I was committed throughout the entire process to ensure that the
26 class members were treated fairly and committed approximately 55 hours to this case.

27 8. I am not aware of any claim I am making in this case that only applies to me and not
28 my fellow Class Members. Nor do I believe I have any interest in the outcome of this case that is in

1 conflict with the interests of the rest of the Class Members. As part of fulfilling my duties as a class
2 representative for this lawsuit, I made and performed the following duties. (1) I represented the
3 interest of all class members; (2) I always considered the interest of the Class just as I would consider
4 my own interests and put the interests of the Class before my own interests; (3) I served as one of
5 the fiduciaries of the Class; (4) I actively participated in the lawsuit by searching for documents,
6 keeping in contact with my attorneys, and answering their questions as needed; and (5) I followed
7 the progress of the lawsuit and provided all relevant information to my attorneys.

8 9. To achieve this settlement, I believe I have done everything my attorneys have asked
9 of me, and have given my best efforts to represent the Class Members. Throughout the course of
10 this litigation, I participated in every step of the litigation from the case initiation, the filing of the
11 amended complaints, the mediation, the settlement agreement review and execution as well as the
12 approval process

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14 I declare under the penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct. Executed on this 4th day of June 2025 in Irvine, California.

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19 Juan Manuel Parra Chavez, Declarant
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