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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF STANISLAUS

EDWARD GRAY; JESSICA MUTO; KEILY
VILLEDA; TAMMY LALLIER; and
JONATHAN HARRISON-LIAM OLSON II,
individuals; on behalf of themselves, and on
behalf of all persons similarly situated,

Plaintiffs,

v.

SKY HOTELS, INC., a California corporation;
MODCO 2, LLC, a California limited liability
company; J. R.P. HOSPITALITY, INC., a
California corporation; CY3 LLC, a California
limited liability company; NIMESH PATEL,
an individual; SUREKHA PATEL, an
individual; and MAHESH PATEL, an
individual; and DOES 1-50, Inclusive,

Defendants.

Case No.: CV-22-004004

**DECLARATION OF TAMMY LALLIER
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: August 14, 2026

Time: 08:30 a.m.

Judge: Hon. Clifford Tong

Dept.: 23

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Attorneys for PLAINTIFFS

1 I, Tammy Lallier, declare as follows:

2 1. I am over the age of eighteen, a California resident, Plaintiff and Proposed Class
3 Representative in the above-entitled matter. I submit this declaration in support of Plaintiff's Motion
4 for Final Approval of Class Action and PAGA Settlement and in support of Motion for Attorneys' Fees
5 and Attorneys' Expenses and Service Awards. I have personal knowledge of all the facts stated herein.
6 I could and would competently testify under oath to these facts in court if requested to do so.

7 2. I retained Class Counsel in April 2023 and joined the lawsuit in May 2023. The suit is
8 brought on behalf of myself and a class of all current and former non-exempt hourly employees of
9 Defendants that worked in California at any time during the period from September 6, 2018 and February
10 10, 2024 (the "Class Period").

11 3. I worked for Defendant as a non-exempt employee, paid on an hourly basis, and entitled
12 to legally mandated meal and rest periods, minimum wages, and overtime compensation, in California
13 from 2022 to January 2023. Throughout my employment, I was subject to Defendants' written policies
14 and procedures.

15 4. I joined the case because I believed my rights as an employee were violated by Defendants
16 and also the rights of other employees that worked for Defendants. Among other claims, I believe
17 Defendants failed to pay for all time worked, failed to furnish accurate itemized wage statements, failed
18 to provide compliant meal and rest periods, failed to pay overtime and sick pay at the correct regular
19 rate of pay, failed to reimburse for mandatory business expenses, and failed to pay all wages when due.

20 5. Before I joined the case as a plaintiff and Class Representative, I spoke at length with my
21 attorneys. We discussed my work experience and how company policies were applied to me and other
22 employees. I provided the attorneys with documents they requested. We reviewed the documents
23 together and asked and answered many questions regarding my experience working for Defendants, the
24 litigation process, and about class actions generally.

25 6. During these conversations, I learned about my responsibilities as a plaintiff in the lawsuit
26 and as a proposed Class Representative. I understood that pursuing this action as a class action rather
27 than merely seeking my individual claims substantially increased the risk to me. Those risks included
28 the possibility of being held liable for Defendants' attorneys' fees and costs in a complex class action if

1 I lost the case. I also understood that as a Class Representative, I would be under increased scrutiny by
2 the attorneys and the Court because I needed to prove that I was an adequate class representative.
3 Further, I understood that I would lose some autonomy over my individual claims that I could not make
4 decisions for my sole benefit and that I needed to make every litigation decision with the best interests
5 of the Settlement Class in mind.

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

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

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

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

20 11. **Review and Approval of Settlement:** A mediation was held on December 12, 2023, and
21 resulted in the proposed settlement. Even though I could not attend mediation, I was available by
22 telephone to speak with my attorneys and did speak with them regarding the mediation before it took
23 place, as well as during the mediation itself. I also spoke with my attorneys after the mediation and
24 discussed the settlement. I was very satisfied with the terms of the settlement that was agreed to by the
25 parties. When the settlement papers were ready, I again spoke with my attorneys and reviewed the
26 settlement agreement which I signed on August 8, 2025.

27 12. **Participation:** Since I retained Class Counsel approximately three years ago, I have been
28 actively involved with this class action lawsuit performing the duties described above. While I did not

1 keep formal time records, I was in regular contact with my attorneys, reviewed important court filings,
2 and spent considerable time on the issues presented during the litigation and in the settlement process.
3 I estimate that I spent approximately 10-20 hours working on this case.

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

9 14. Ultimately, I believe I did the right thing in pursuing this case on behalf of the class who
10 now stand to receive substantial monetary payments as a result of this case and settlement. I also believe
11 that the requested Service Award in the amount of \$10,000 from the settlement is fair compensation for
12 (1) the work I performed, (2) the sacrifices made not pursuing this case individually, and (3) the risks I
13 undertook.

14 15. In light of all the time and effort I have spent on this case, the sacrifice I have made, the
15 risks I undertook by suing a former employer, the broad general release, the exposure to being
16 responsible for paying Defendants' costs in the event we did not win the case, and in light of the size of
17 the settlement, I believe the request for \$10,000 as a Class Representative Payment is fair and reasonable.

18 16. Further, I support my attorneys' application for a payment of Attorneys' Fees and
19 Litigation Costs in the amount of up to \$191,666.67, comprised of attorneys' fees equal to one third of
20 the Gross Settlement Amount estimated to be \$161,666.67 and up to \$30,000.00 for actually incurred
21 litigation expenses.

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17. I have in place a written fee agreement with Class Counsel wherein I provided written consent to the requested Attorneys' Fees and Litigation Expenses.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 4/10/26, at Modesto, California.

By: Tammy Lallier (Apr 10, 2026 13:21:04 PDT)
TAMMY LALLIER