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Attorneys for Plaintiffs

SUPERIOR COURT FOR THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF STANISLAUS

EDWARD GRAY and JESSICA MUTO,
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; and DOES 1-50, Inclusive,

Defendants.

Case No. CV-22-004004

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

Date: December 16, 2025

Time: 8:30 a.m.

Judge: Hon. John D. Freeland

Department: 23

1 I, TAMMY LALLIER, 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 proposed plaintiff in the above
4 wage and hour class and PAGA action filed against SKY HOTELS, INC., and MODCO 2, LLC, with
5 defendants CY3, LLC, J.R.P. HOSPITALITY, INC., NIMESH PATEL, SUREKHA PATEL, and
6 MAHESH PATEL to be added as defendants (hereinafter "Defendants").

7 2. I am submitting this declaration in support of Plaintiffs' Motion for Preliminary Approval
8 of Class and PAGA Action Settlement.

9 3. I believe that I am, have been and will continue to represent the interests of the class fairly
10 and adequately. I have claims that are typical of the claims the Class Members that I am seeking to
11 represent. Specifically, I worked for Defendants from approximately 2022 to January 2023 as a non-
12 exempt employee in California. Defendants own, operate, and/or manage hotels and provide hotel
13 management, consulting, development, and financial services throughout the state of California,
14 including in the county of Stanislaus. As a non-exempt employee compensated on an hourly basis, I
15 was entitled to legally mandated meal and rest periods and minimum wage and overtime compensation.
16 During my employment, Defendants failed to, among other things, provide compliant meal and rest
17 periods, pay for all hours worked, pay the correct regular rate of pay, issue compliant wage statements,
18 reimburse necessary business expenses, and pay all monies owed when due. Throughout my
19 employment, I was subject to Defendants' written policies and procedures.

20 4. My claims are typical of the claims of the Class Members that I am seeking to represent
21 because I was subject to the same alleged unlawful employment policies and practices at issue in this
22 action, including but not limited to, Defendants' failure to provide legally mandated meal and rest
23 periods, failure to pay for all hours worked, failure to provide compliant wage statements, failure to
24 correctly calculate the correct regular rate of pay, failure to reimburse necessary business expenses, and
25 failure to pay all monies owed when due. Factually, Defendants' policies and practices apply class
26 wide, and Defendants' liability can be determined by facts common to all members of the Class.

27 5. Further, there is no conflict between my interests and the interests of the class that I am
28 seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that

1 I was injured by the same company-wide policies and practices to which the proposed Class was
2 subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests
3 of the Class by joining this litigation, communicating with class counsel about the claims as they apply
4 to myself and others, undertaking extensive class document evaluation and evaluating the proposed
5 settlement to assure that it is fair.

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

15 7. I believe that the proposed settlement before the court is fair, reasonable and adequate,
16 and made in the best interest of the Participating Class Members. Consequently, I respectfully, and
17 humbly, ask the Court to Grant preliminary approval of the Settlement and all of its terms.

18 I declare under the penalty of perjury under the laws of the State of California that the foregoing
19 is true and correct. Executed 10/02/2025, at Modesto (location/city), California.

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21 By: 
22 Tammy Lallier (Oct 2, 2025 10:13:51 PDT)
23 TAMMY LALLIER
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