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9 **UNITED STATES DISTRICT COURT**
EASTERN DISTRICT OF CALIFORNIA

10 JANICE INSIXIENGMAY, individually and on
11 behalf of all other similarly situated employees,

12 Plaintiff,

13 vs.

14 HYATT CORPORATION DBA HYATT
REGENCY SACRAMENTO, a Delaware
15 Corporation; and DOES 1 to 100, inclusive,

16 Defendants.
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Case No.: 2:18-CV-02993-TLN-SCR

CLASS ACTION

**DECLARATION OF KAYLIE O’CONNOR ON
BEHALF OF CPT GROUP, INC., IN SUPPORT OF
PLAINTIFF’S MOTION FOR FINAL APPROVAL
OF CLASS ACTION AND PAGA SETTLEMENT**

Date: September 19, 2024
Time: 2:00 p.m.
Courtroom: 2, 15th Floor
Judge: Hon. Troy L. Nunley

Filed: October 4, 2018
FAC Filed: April 7, 2020
SAC Filed: April 6, 2023
Trial Date: None Set

DECLARATION OF KAYLIE O’CONNOR

I, Kaylie O’Connor, hereby declare:

1. I am employed as a case manager by CPT Group, Inc. (“CPT”), the Court-appointed Settlement Administrator. I am authorized to make this declaration on behalf of CPT. As the case manager for this settlement, I have personal knowledge of the information provided herein, and if called as a witness, I could and would accurately testify thereto.

2. I am submitting this declaration in support of Plaintiff’s Motion for Final Approval of Class Action and PAGA Settlement, which updates and supplements my prior declaration filed on May 9, 2024, (Doc. No. 79-4).

3. The Notice Packet advised Class Members that the deadline to object, opt out, and/or submit a dispute was May 24, 2024.

4. As of the date of this declaration, 129 Notice Packets have been returned by the post office. For those without forwarding addresses, CPT performed skip traces to locate new mailing addresses. A total of 110 Notice Packets were re-mailed because a better mailing address was found. Altogether, 19 Notice Packets were unable to be delivered because a better mailing address could not be found.

5. As of the date of this declaration, CPT has received one request to opt out of the Settlement from Alexis Gutierrez.

6. As of the date of this declaration, CPT has received no objections to the Settlement.

7. As of the date of this declaration, CPT has received no workweek disputes.

8. As of the date of this declaration, a total of 1,077 Class Members will be paid their portion of the Net Settlement Amount, which represents a participation rate of 99.9%. 259 of the Class Members are also Aggrieved Employees who will receive a portion of the PAGA Payment.

9. Pursuant to the Settlement Agreement, seventy percent (70%) of the net settlement amount (“NSA”) was allocated to Subclass 1 and thirty percent (30%) of the NSA was allocated to Subclass 2. The NSA was calculated as set forth below:

Gross Settlement Amount	\$295,000.00
Less Attorneys’ Fees (Requested)	\$103,250.00

1	Less Litigation Expenses (Requested)	\$29,051.07
2	Less Class Representative Enhancement Payment (Requested)	\$10,000.00
3	Less Settlement Administrator Costs (Requested)	\$13,500.00
4	Less PAGA Payment	\$10,000.00
5	Net Settlement Amount	\$129,198.93

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10. Each Class Member’s share of the NSA will be proportionate to their total Qualifying Workweeks worked within their respective subclass. According to Defendant’s records, Subclass 1 Members in aggregate worked a total of 69,936 weeks during the Subclass 1 Period. Each week in the Subclass 1 Period is accordingly valued at \$1.29. According to Defendant’s records, Subclass 2 Members in aggregate worked a total of 35,182 weeks during the Subclass 2 Period. Each week in the Subclass 2 Period is accordingly valued at \$1.10. The average estimated total share of the class settlement is \$119.96, the highest is \$538.65.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 14th day of August, 2024, at Irvine, California.



Kaylie O’Connor