

DIVERSITY LAW GROUP, P.C.
Larry W. Lee (State Bar No. 228175)
lwlee@diversitylaw.com
Simon L. Yang (State Bar No. 260286)
sly@diversitylaw.com
515 South Figueroa Street, Suite 1250
Los Angeles, California 90071
Telephone: (213) 488-6555
Facsimile: (213) 488-6554

POLARIS LAW GROUP
William L. Marder (State Bar No. 170131)
bill@polarislawgroup.com
501 San Benito Street, Suite 200
Hollister, California 95023
Telephone: (831) 531-4214
Facsimile (831) 634-0333

Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA

FNU LINAKI, as an individual and on behalf of
all others similarly situated, and as a private
attorney general,

Plaintiff,

vs.

GENJI PACIFIC, LLC, (also known as HANA
GROUP OPS, LLC) a Delaware limited liability
company; and DOES 1 through 50, inclusive,

Defendants.

Case No. RG20074795

[Hon. Stephen Kaus, Department 19]

**DECLARATION OF FNU LINAKI IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: October 5, 2022
Time: 3:00 p.m.
Department: 19

Reservation ID: 386125078699

Complaint Filed: September 23, 2020

1 I, Fnu Linaki, declare as follows:

2 1. I am an individual over the age of 18. I am the named plaintiff in the above-reference
3 action. I have personal knowledge of the facts set forth below, except as to those matters stated on
4 information and belief and, as to those matters, I believe them to be true. If called as a witness, I could
5 testify competently as to the matters stated in this declaration.

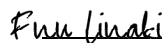
6 2. I began working for Genji Pacific, LLC in or about August of 2010. Until my
7 employment as a supervisor sushi chef was terminated in or about August of 2020, I was paid on an
8 hourly basis as a non-exempt employee. I am informed and believe that I was underpaid overtime wages
9 in light of incentives and bonuses I earned. I also was not paid my wages within seven days of the last
10 day of each pay period.

11 3. I have taken all necessary steps to represent the interests of the Class, including by
12 providing information and documents to my counsel, discussing the claims and lawsuit with my counsel,
13 and answering any questions that have come up. I understand that I am responsible to the Class with
14 respect to trying the case, appearing in court, and working with Class Counsel. I am willing to act as a
15 fiduciary for the Class. I remain willing to devote my time to this lawsuit for the benefit of the Class. I
16 do not believe I have any interests that are adverse to the interests of the Class. I also am unaware of any
17 such issues having been raised or presented by anyone else.

18 4. I believe many employees would not sue their employer out of fear. I took on risks by
19 bringing this lawsuit, and I understand that other people will benefit because of the actions that I have
20 taken. I feel that it is a positive accomplishment, am proud of the result, and believe that the class
21 settlement is fair, adequate, and reasonable.

22 I declare under penalty of perjury under the laws of the State of California that the foregoing is
23 true and correct. Executed this 31st day of August 2022, at Hayward, California.

24 DocuSigned by:

25 

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Fnu Linaki