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and Bounia Williams-Pickens

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

TIM BERMEJO, individually, and on behalf
of other members of the general public
similarly situated,

Plaintiff,

v.

TIFFANY AND COMPANY., a New York
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 21STCV27417

Honorable Elaine Lu
Department 9

CLASS ACTION

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

[Plaintiffs' Notice of Motion and Motion
for Preliminary Approval of Class Action
and PAGA Settlement; Declaration of
Proposed Class Counsel (Maria
Halwadjian); and [Proposed] Order filed
concurrently herewith]

Complaint Filed: July 27, 2021
Trial Date: None Set

DECLARATION OF GEN WALT

I, **Gen Walts**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the action entitled *Walts v. Tiffany and Company, U.S. Sales, LLC, et al.*, Los Angeles County Superior Court, Case No. 24VECV04389, which is being settled along with the following actions: *Bermejo v. Tiffany and Company*, Los Angeles County Superior Court, Case No. 21STCV27417, and *Williams-Pickens v. Tiffany and Company, et al.*, Los Angeles County Superior Court, Case No. 24VECV05319. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendants Tiffany and Company and Tiffany and Company U.S. Sales, LLC (together, "Defendants") from approximately September 2021 to approximately July 2023 as an hourly-paid Branch Security Officer. I decided to seek legal advice about my work experiences with Defendants and about pursuing my grievances. I contacted Lawyers for Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers for Justice, PC discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff, a PAGA representative, and also, if class certification were to be obtained and if I were to be appointed as a representative of the class, what my duties and responsibilities would be in that event.

3. Throughout the pendency of the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, answering their questions, providing guidance regarding the duties of hourly and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I frequently checked in with my attorneys

1 and their staff to make sure that they had all my most current information and any additional
2 information that I had obtained.

3 4. As the case progressed, I was available to answer any questions my attorneys had
4 and remained available to speak and meet with my attorneys whenever they needed me. I
5 responded to them as quickly as possible and gave them as much information and identified as
6 many documents as I could. I spent time speaking with my attorneys about the case, identifying
7 potential witnesses, providing my attorneys with documents and information concerning the case,
8 and also describing policies, practices, and procedures of Defendants.

9 5. As far as the settlement is concerned, I was available to review documents and
10 answer any questions my attorneys had. I reviewed the settlement agreement and discussed the
11 questions I had regarding the potential settlement with my attorneys before signing the settlement
12 agreement.

13 6. I believe that I have done everything that my attorneys have asked of me and have
14 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
15 obtained in this case, and as a class representative, I respectfully request that the Court award me
16 an enhancement award in the amount of \$15,000.00 for my active participation in this case.
17 Taking into consideration the time that I have dedicated to this case, I believe that this amount is
18 reasonable.

19 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

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1 8. I have not entered into any undisclosed agreements, nor have I received any
2 undisclosed compensation in this matter. The only compensation I will receive is whatever amount
3 the Court awards as an enhancement award, as well as my share of the settlement as a class
4 member and aggrieved employee.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct.

01/06/2026

7 Executed on this ____ day of January 2026, at Hong Kong.

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9 Electronically Signed 2026-01-06 02:09:32 UTC - 49.130.129.89
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Gen Walts