

Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
Helene Mayer (SBN 332975)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – STANLEY MOSK COURTHOUSE**

ERICK ULISSES FELIX individually, and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiff,

vs.

GEN RESTAURANT GROUP, LLC, a
California limited liability company; JAE
CHANG, individually; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 21STCV34502

Honorable Michelle Williams Court
Department 1

**DECLARATION OF ERICK ULISSES
FELIX IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF
PRIVATE ATTORNEYS GENERAL ACT
(CAL. LABOR CODE § 2698, ET SEQ.)
SETTLEMENT AGREEMENT**

[Notice of Motion and Motion for Approval
Of Private Attorneys General Act (Cal. Labor
Code § 2698, Et Seq.) Settlement Agreement;
Declaration of Proposed Class Counsel
(Joanna Ghosh); and [Proposed] Order filed
concurrently herewith]

Reservation ID: 800250953782
Date: August 1, 2024
Time: 8:30 a.m.
Department: 1

Complaint Filed: September 17, 2021
Trial Date: None Set

DECLARATION OF ERICK ULISSES FELIX

I, **Erick Ulisses Felix**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. 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 GEN Restaurant Group, LLC (“GRG LLC”) as an hourly-paid server from approximately October 2020 to approximately May 2021. Jae Chang is GRG LLC’s managing member. Jae Chang and GRG LLC are collectively referred to as “Defendants.” 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 paying their employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately **6 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **7 hours** discussing my situation, representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff and PAGA representative.

3. I have spent over **9 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys and answering their questions, and providing guidance regarding the duties of hourly-paid or non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all my most current information and any additional information that I had obtained.

4. Throughout my involvement in this case, I was available to answer any questions my attorneys had, and was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **10 additional hours** speaking with my attorneys

1 about the case, identifying potential witnesses, providing my attorneys with documents and
2 information concerning the case, and also describing policies, practices, and procedures of
3 Defendants.

4 5. As far as the settlement is concerned, I was available to review documents and
5 answer any questions my attorneys had. I spent about **2 hours** reviewing the settlement agreement
6 and about **3 hours** asking questions and discussing the potential settlement with my attorneys
7 before signing the settlement agreement.

8 6. I believe that I have done everything that my attorneys have asked of me and have
9 tried, to the best of my ability, to seek relief for the aggrieved employees and the State of
10 California. I think my efforts helped to get the result obtained in this case, and as a PAGA
11 representative, I respectfully request that the Court award me a General Release Fee in the amount
12 of \$7,500.00 for my active participation in this case. Taking into consideration the time that I
13 have dedicated to this case, I believe that this amount is reasonable.

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

15 8. I have not entered into any undisclosed agreements, nor have I received any
16 undisclosed compensation in this case. The only compensation I will receive is whatever amount
17 the Court awards as an Enhancement Payment, as well as my share of the settlement as a class
18 member and aggrieved employee.

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

21 05/29/2024

Executed this ____ day of May 2024, at Newport Beach, California.

22 Electronically Signed

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23 Erick Ulisses Felix