

ZAGHI & CHRZAN, LLP
Zachary T. Chrzan (SBN 329159)
zach@zclawyers.com
Brian Zaghi (SBN 343599)
brian@zclawyers.com
10880 Wilshire Blvd., Suite 1101
Los Angeles, CA 90024
Tel: (310) 230-5353

Attorneys for Plaintiff, LUZMY BARRIENTOS,
on behalf of herself and all others similarly situated and aggrieved

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA

LUZMY BARRIENTOS, an individual and on
behalf of all others similarly situated,

Plaintiff,

v.

SHENG KEE OF CALIFORNIA., a California
Corporation; and DOES 1 through 100,
inclusive,

Defendants.

CASE NO.: C25-01001

[Assigned to the Hon. Benjamin T. Reyes, II in
Dept. 39]

**DECLARATION OF BRIAN ZAGHI IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND REPRESENTATIVE
ACTION SETTLEMENT AND
PROVISIONAL CLASS
CERTIFICATION FOR SETTLEMENT
PURPOSES ONLY**

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1 or been appointed Class Counsel include, without limitation:

2 • *Brooks v. Atlas Disposal*, Case No. 25CV004770, California Superior Court, County of
3 Sacramento, Honorable Lauri A. Damrell, presiding.

4 • *Kim v. Barefoot Dreams, Inc., et al.*, Case No. 23STCV03111, California Superior Court,
5 County of Los Angeles, Honorable Judge Theresa M. Traber, presiding.

6 • *Hernandez v. Todd Pipe & Supply, LLC.*, Case No. 22STCV30190, California Superior
7 Court, County of Los Angeles, Honorable Stuart M. Rice, presiding.

8 • *Low v. Triple Canopy, Inc.*, Case No. 37-2023-00007078-CU-OE-CTL, California
9 Superior Court, County of San Diego, Honorable Carolyn Caietti, presiding.

10 • *Chan v. Panera.*, Case No. 23STCV09024, California Superior Court, County of Los
11 Angeles, Honorable William F. Highberger, presiding.

12 • *Ortega v. BA2, LLC, et al.*, Case No. 22STCV35633, California Superior Court, County
13 of Los Angeles, Honorable Elihu M. Berle, presiding.

14 • *Rigsby v. Reyes Coca-Cola Bottling, LLC.*, Case No. 23CV010356, California Superior
15 Court, County of Sacramento, Honorable Lauri A. Damrell, presiding.

16 • *Arnett v. Traditions Health LLC., et al.*, Case No. CVRI2305219, Riverside Superior
17 Court, Honorable Harold W. Hopp, presiding.

18 • *Easton v. Sunset Tower Management, LLC, et al.*, Case No. 22STCV34112, Los Angeles
19 Superior Court, Honorable Laura A. Seigle, presiding.

20 • *Garcia v. United Site Services of California, Inc.*, Case No. 2:23-CV-03019-MRA-SK,
21 United States District Court for the Central District of California, Honorable Mónica Ramírez
22 Almadani, presiding.

23 • *Boothe v. Lemonade Restaurant Group, LLC.*, Case No. 22STCV38302, California
24 Superior Court, County of Los Angeles, Laura A. Seigle, presiding.

25 • *Hernandez vs. Hyder & Company*, Case No. 56-2022-00570283-CU-OE-VTA,
26 California Superior Court, County of Ventura, Hon. Jeffrey G. Bennett, presiding.

27 • *Nunley v. Cardinal Logistics Management Corporation, et al.*, Case No.
28 CIVSB2210430, California Superior Court, County of San Bernardino, Honorable David Cohn,

1 presiding.

2 • *Garzia, et al., v. Destiny Farms, LLC, et al.*, Case No. 21CV04529, California Superior
3 Court, County of Santa Barbara, Honorable James F. Rigali, presiding.

4 I have also settled matters on a “PAGA Only” basis for aggrieved employees in the past,
5 including, without limitation, in:

6 • *Alvarado v. The Irvine Company, LLC, et al.*, Case No. 30-2019-01050823-CU-
7 OE-CXC, California Superior Court, County of Orange, Honorable William Claster, presiding;

8 • *Wright v. Aperto Property, et al.*, Case No. 30-2023-01312346-CU-OECXC,
9 California Superior Court, County of Orange, Honorable Judge Layne Melzer, presiding;

10 8. Currently, my firm is acting as counsel in dozens of wage and hour class actions
11 and representative PAGA actions.

12 9. After a thorough investigation and settlement discussions, class counsel arrived at
13 terms that they viewed was in the best interest of both the class members and the parties.

14 10. Should the Court refuse to grant preliminary approval of this Settlement, many of
15 the Class Members may be denied any recourse for defendants’ alleged violations.

16 11. For these reasons, as well as the reasons provided in the Declaration of Zachary T.
17 Chrzan, I believe that Class Counsel are sufficiently experienced and qualified to evaluate the class
18 members’ claims and viability of defendants’ defenses.

19 12. I believe, and as further set out in the Declaration of Zachary T. Chrzan, the
20 settlement presented here only resulted after having engaged in extensive informal and formal
21 discovery and investigation and is the product of hard-fought litigation and extensive arm’s-length
22 negotiations.

23 13. I believe, based on my experience as class counsel, that the settlement is fair,
24 reasonable, adequate and in the best interests of class members.

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I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct this July 10, 2026, at Los Angeles, California.

/s/ Brian Zaghi
Brian Zaghi

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I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my mailing address is 10880 Wilshire Blvd., Suite 1101, Los Angeles, CA 90024.

HIXSON NAGATANI LLP
 2021 The Alameda, Suite 240
 San Jose, CA 95126
 Jay J. Wang, Esq.
jay@hnemploymentlaw.com
 Alexa L. Morgan, Esq.
alexa@hnemploymentlaw.com



Based on a Court order or on an agreement by the parties to accept service by e-mail or electronic transmission, I caused the document(s) described above to be electronically served to the persons at the e-mail addresses listed. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

Executed on July 10, 2026 at Los Angeles, California.

Mary Bolaños