

B. James Fitzpatrick (SBN: 129056)
Alison L. Baker (SBN: 193601)
FITZPATRICK & SWANSTON
555 S. Main Street
Salinas, CA 93901
Telephone: (831) 755-1311
Facsimile: (831) 755-1319

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

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MONTEREY**

JASMIN JIMENEZ, on behalf of herself and all
similarly aggrieved employees,

Plaintiff,

vs.

SEA HOUSE SALINAS, LLC; OMAR
CAMPOS; SHAN BAO GUO; BAG O'CRAB,
INC.; SEA HOUSE SL LLC; BAG O CRAB MC
LLC; and DOES 3 through 50, inclusive,

Defendants.

Case No. 23CV000504

[Assigned to Hon. Thomas W. Wills, Dept. 15]

**DECLARATION OF ALISON L. BAKER IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: January 31, 2025
Time: 8:30 a.m.
Department: 15

Complaint Filed: February 16, 2023
FAC Filed: June 5, 2023
SAC Filed: November 8, 2024

1 I, Alison L. Baker, hereby declare and state as follows:

2 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
3 California, and I am an associate with the law firm Fitzpatrick & Swanston, counsel of record for
4 Plaintiff Jasmin Jimenez (“Plaintiff”). I have personal knowledge of the facts set forth below and if
5 called to testify I could and would do so competently.

6 2. I am familiar with all aspects of this case and all tasks undertaken by the various
7 members of this firm in litigating this case. I believe this Settlement to be fair, reasonable, and
8 adequate, and in the best interest of the Class Members as a whole.

9 3. My qualifications are as follows: I was awarded my bachelor’s degree from the
10 University of California, Davis, with Honors, including a one-year study abroad program in Madrid,
11 Spain. I received my Juris Doctorate degree from Santa Clara University School of Law, where I earned
12 a certificate of Public Interest Law, worked as a judicial extern in the United States Northern District
13 Court, and at the East San Jose Community Law Center Worker’s Rights Clinic. I was admitted to the
14 State Bar in December 1997, and started as an associate attorney at the Law Offices of Vincent P.
15 Hurley in Salinas, CA; an AV rated civil litigation practice serving as outside litigation counsel to public
16 entities as defense counsel, including many employment law matters. I assisted in discovery, motions,
17 and all aspects of trial preparation, and wrote winning summary judgment motions on behalf of San
18 Benito County and Monterey County. In the year 2000, I switched to plaintiff’s-side litigation and
19 joined the National Association of Consumer Advocates. From 2000-2008, I focused on consumer
20 protection and public interest cases, including many consumer class actions and representative actions
21 under the Private Attorney General Act, while employed with the law firm Kemnitzer, Anderson, Barron
22 & Ogilvie in San Francisco, CA. I acted as lead trial counsel in civil jury and bench trials, and
23 successfully resolved representative consumer actions and obtained injunctions on behalf of thousands
24 of Californians. My work emphasized Spanish-language protections in consumer financing, auto sales
25 and leasing, and prosecuting unfair debt collection practices and unfair/unlawful credit reporting.

26 4. From 2008 through 2018, I had the honor of joining the Superior Court of California,
27 County of Santa Cruz, as a Judicial Attorney. I served as a Staff Attorney, Civil and Small Claims
28 Advisor at the Court’s Self-Help Center and Office of the Family Law Facilitator. My employment law

1 work there involved advising self-represented litigants in termination, discrimination, and wage & hour
2 cases in Small Claims Court, and in enforcing judgments filed by the Labor Commissioner.

3 5. From 2018 through October 2022, I practiced employment and consumer protection
4 litigation at the Watsonville Law Center in Watsonville, California. As the Director of Litigation, I
5 focused on using civil litigation to achieve justice for poor and vulnerable communities in the areas of
6 employment and housing. I participated in the law center's employment law clinics, and I represented
7 clients in front of the Labor Commissioner.

8 6. In October 2022, I joined the law firm Fitzpatrick & Swanston, where I practice labor and
9 employment litigation, primarily Plaintiff-side class and representative actions.

10 7. Currently, our firm serves as counsel for plaintiff(s)/the class in multiple ongoing wage
11 and hour class actions in Alameda County Superior Court, Monterey County Superior Court, Nevada
12 County Superior Court, Santa Clara Superior Court, San Benito Superior Court, Santa Cruz Superior
13 Court, Ventura County Superior Court, and the United States District Court for the Eastern and Northern
14 Districts of California.

15 8. I do not have a conflict of interest with Plaintiff or the Class Members. I will adequately
16 represent the Class. I have and will zealously represent Plaintiff and the Class Members and pursue this
17 lawsuit to its conclusion.

18 9. I do not have any relationship with the proposed *cy pres* recipient that would create an
19 actual or potential conflict of interest. The Parties further agree that proposed *cy pres* satisfies the
20 legislative intent set out in Code of Civil Procedure § 384(a), in that the organization helps further the
21 purposes of the underlying action and promote justice for all Californians.

22 I declare under penalty of perjury under the laws of the State of California that the foregoing is
23 true and correct and if called as a witness I could and would competently testify to each of the matters
24 stated herein, and I state that these matters are based upon my own personal knowledge acquired
25 through first-hand observation, except where stated otherwise. This declaration was executed by me on
26 January 8, 2025, in Salinas, California.

27 

28 Alison L. Baker