

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 (SBN: 228175)
Simon L. Yang (SBN: 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 JASMIN JIMENEZ IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: June 27, 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, Jasmin Jimenez, 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 at Sea House Salinas in around March of 2021 and worked there for
7 over a year until around June of 2022. During my employment with the company, I worked hours that
8 were not compensated at the required minimum wage. I am informed and believe that I also was
9 underpaid overtime, sick pay, and vacation pay as a result of the company's miscalculation of my
10 regular rate of pay. Moreover, on occasions that I worked at least 3.5 hours, I often was not provided a
11 lawful rest period. On occasions that I worked more than 5.0 hours, I often was not provided a lawful
12 meal period. Based on these circumstances, I am informed and believe that I was not timely paid all of
13 my earned wages during employment or upon the separation of employment, and I also am informed
14 and believe that I was not furnished accurate itemized wage statements. Finally, I was required to use
15 my own phone to perform work duties for the company but was not reimbursed for any of the related
16 expenses.

17 3. During the pendency of this lawsuit, I have done my best to represent the interests of the
18 employees that are part of the class. I have actively contributed to the litigation of this case. My
19 contributions include but are not limited to (i) participating in three (3) in-person meetings of more than
20 two hours with my attorneys as they researched and investigated my case, and participating in numerous
21 telephonic (7) meetings with my attorneys and their staff of 24 minutes or more and (6) telephonic
22 meetings of .2 to discuss the case and review documents prepared on my behalf, (ii) providing my
23 attorneys with information and documents regarding my employment, (iii) searching for additional
24 information and documents requested by my attorneys, (iv) reviewing and approving the written notice
25 to the Labor and Workforce Development Agency, the complaint and amendments, and other papers
26 filed with the court, (v) reviewing documents and information my attorneys were provided by the
27 company or its attorneys, (vi) participating in written discovery by searching for documents and
28

1 communications, providing information to my attorneys, and meeting with my attorneys and their staff
2 twice (two hour meetings) to review the discovery responses, and participating in the depositions by
3 attending the deposition and assisting my attorneys in investigating the time clocking and recording
4 procedures at the restaurant, (vii) driving myself and attending an all-day in-person mediation in Santa
5 Clara, which went overtime, and I did not leave location until approximately 7:00PM, (viii) reviewing
6 and executing the settlement agreement, and (ix) reviewing and signing documents submitted to this
7 Court in support of the settlement. During the more than two years that this lawsuit has been pending, I
8 have easily spent at least 2 hours per month, on average—or approximately 48 hours total—in
9 progressing the litigation on behalf of the Class.

10 4. I understand that the class claims alleged in this action were brought on behalf of other
11 similarly situated employees, and thus I am acting as a representative for the Class. I understood that an
12 individual case would have resolved much faster than a class action and involved much less financial
13 risk than a class action.

14 5. Throughout the lawsuit, I have been kept apprised of the status of this case. As the class
15 representative, I understand that it is my responsibility to act in the Class's best interest and not my own.
16 I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of any
17 conflicts that exist between my interest and the interests of the Class that would impair or affect my
18 ability to serve as representative for the Class. Indeed, in order to pursue claims on behalf of the Class, I
19 did not accept a settlement of individual claims (or the consideration offered) that would have required
20 me to abandon the class claims alleged in this case.

21 6. I have and continue to be willing to assist in the investigation of this matter as well as
22 make myself available for trial or any further proceeding in this matter as required to represent the
23 interests of the Class. I also understand my duties and responsibilities to the proposed class and will
24 carry out those duties as necessary.

25 7. I have discussed the terms of the settlement agreement with my attorneys, and based on
26 my understanding of the case, I am of the opinion that settlement for the consideration and on the terms
27
28

set forth in the settlement agreement are fair, reasonable, and adequate, and in the best interests of the Class.

8. I understood that filing this lawsuit is a public record and I accepted that burden. This lawsuit is something that potential employers can look into, and which may cause a negative impact of my employment prospects, especially as a young person trying to find employment in the restaurants and hospitality businesses in Monterey County. I also understood that there were risks due to my involvement as a named plaintiff in a representative lawsuit against a former employer. For instance, if I lost, I might have to face a judgment for some of Defendant's legal costs. Even understanding all these risks, I was willing to move forward and bring this case on behalf of the other employees.

9. Apart from class claims against the company, I have numerous individual claims that I separately pursued against the company, in addition to other individual claims that I could separately pursue against the company. Nonetheless, as part of the settlement, I agreed to sign a general release of claims and a waiver of any rights I have under Civil Code section 1542. I understand the proposed settlement does not require similar releases of any other employees.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 4th day of June 2025, at Salinas, California.

DocuSigned by:
Jasmin
82E40E77FC9387A...

Jasmin Jimenez

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

On the date written below, I served the foregoing document(s), described as
**DECLARATION OF JASMIN JIMENEZ IN SUPPORT OF PLAINTIFF’S MOTION
 FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**
 on the interested parties in this action as indicated below and by the following means:

Marie Trimble Holvick (SBN: 257891)
Amber Eklof (SBN: 305750)
Elizabeth Chrstie (SBN: 341615)
GORDON REES SCULLY
MANSUKHANI, LLP
315 Pacific Avenue
San Francisco, CA 94111
Telephone: (415) 986-5900
Facsimile: (415) 986-8054
mholvick@grsm.com
aeκλοf@grsm.com
sfields@grsm.com

Attorneys for Defendants
SEA HOUSE SALINAS, LLC AND
OMAR CAMPOS

(BY ELECTRONIC SERVICE) Pursuant to CCP § 1010.6 and Cal. Rules of Court, Rule 2.251, I caused the document(s) to be served, addressed to the person(s) at the e-mail address(es) listed above. I did not receive within a reasonable time after e-service, any electronic message or other indication that e-service was unsuccessful.



Josie Favila