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**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  
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, 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 numerous telephonic meetings with my  
20 attorneys and their staff to discuss the case and review documents prepared on my behalf, (ii) providing  
21 my attorneys with information and documents regarding my employment, (iii) searching for additional  
22 information and documents requested by my attorneys, (iv) reviewing and approving the written notice  
23 to the Labor and Workforce Development Agency, the complaint and amendments, and other papers  
24 filed with the court, (v) reviewing documents and information my attorneys were provided by the  
25 company or its attorneys, (vi) participating in written discovery, (vii) being available for a mediation,  
26 (viii) reviewing and executing the settlement agreement, and (ix) reviewing and signing documents  
27 submitted to this Court in support of the settlement.

12 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
13 true and correct. Executed this 3<sup>rd</sup> day of January 2025, at Salinas, California.

DECLARATION OF JASMIN JIMENEZ IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT