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Attorneys for JULIANNE CRUZ, on behalf of herself,
all others similarly situated, and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF ORANGE

JULIANNE CRUZ on behalf of herself,
all others similarly situated, and on
behalf of the general public,

Plaintiffs,

v.

PMAB-8, LLC dba PAUL MARTIN'S
AMERICAN GRILL; and DOES 1-100,
Defendants.

Case No. 30-2023-01318976-CU-OE-CXC

*[Assigned for All Purposes to the
Honorable Melissa R. McCormick; Dept.
CX104]*

**DECLARATION OF PLAINTIFF
JULIANNE CRUZ IN SUPPORT OF
MOTION FOR APPROVAL OF PAGA
SETTLEMENT**

Complaint Filed: April 13, 2023
FAC Filed: September 28, 2023
Trial Date: None Set

I, JULIANNE CRUZ, hereby declare under penalty of perjury as follows:

1. I have personal knowledge of all matters stated herein, and if called as a witness, I could and would competently testify thereto, except as to those matters stated upon information and belief, and as to those matters, I believe them to be true.
2. I am the named Plaintiff in the above-captioned lawsuit, and I submit this declaration in support of settlement approval.
3. I worked for PMAB-8, LLC dba Paul Martin's American Grill ("Paul Martin's") as a server and bartender in California. I started working for Paul Martin's on or about August 24, 2021, to on or about December 21, 2022.
4. I originally decided to contact an attorney because I felt that some of Paul Martin's policies and practices violated the law.
5. Since filing this case, I diligently worked on this case. I have been in regular contact with my attorneys throughout the prosecution of this case and have been kept apprised of all aspects of the case. Throughout the litigation, I have always been available to provide my attorneys with helpful information for this lawsuit.
6. I always answered phone calls from my attorneys or called them back promptly when they called. I also promptly responded to emails sent by my attorneys. On many occasions, I spoke with my attorneys for case related purposes.
7. At the beginning of the case, I searched for and provided my attorneys with documents I received from Paul Martin's, such as my paycheck stubs.
8. Although I did not attend the mediation in person, I was available via phone. I gave my consent to settle with Paul Martin's for the gross settlement amount of \$700,000, which I find to be fair and reasonable.
9. I completely and carefully reviewed the settlement agreement. I then signed the settlement agreement.
10. I estimate that I spent approximately 30 hours in prosecuting this case.

1 11. I initiated this lawsuit on behalf of myself and the other aggrieved employees because I
2 wanted to fix what I perceived as problems affecting all of us. From the very beginning, I
3 understood that I was participating in this case, not only for my own benefit, but for the
4 many past and present non-exempt, hourly employees.

5 12. While I truly believe that I was doing the right thing in pursuing this case, I do believe that
6 I have paid a price for the greater good of other employees, who will now obtain some
7 relief through the terms of the proposed settlement.

8 13. In light of the work I performed in this case and the duties associated with being the named
9 plaintiff in a case of this magnitude, I believe the \$10,000 PAGA representative payment
10 request is reasonable. I understand that this additional award is not guaranteed and is
11 subject to Court approval.

12 14. I have and will continue to adequately represent all of the interests of the Aggrieved
13 Employees. I will treat the interests of the Aggrieved Employees above my own interests.

14 I declare under penalty of perjury under the laws of the State of California that all the
15 foregoing is true and correct.

16 Dated: 5/12/2026

DocuSigned by:
By: 
JULIANNE CRUZ