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Attorneys for Defendants  
WNU LLC DBA PAPA JOHNS, PAUL URBINA AND BRISIA OCHOA

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES, CENTRAL DISTRICT, SPRING STREET COURTHOUSE**

SALVADOR RODRIGUEZ, GERMAN  
RODRIGUEZ on behalf of Themselves and All  
Other Current and Former Employees Similarly  
Situating,

Plaintiffs,

vs.

WNU LLC DBA PAPA JOHNS, a Washington  
Limited Liability Company, PAUL URBINA,  
BRISIA OCHOA, Individuals, and DOES 1-50,  
inclusive,

Defendants.

CASE NO.: 23STCV28934

*(Assigned for all purposes to the  
Hon. David S. Cunningham, III, Dept. 11)*

**DECLARATION OF KAREN LUH  
REGARDING CY PRES RECIPIENT**

Hearing Date:  
Hearing Time:  
Dept.: 11

Complaint Filed: November 22, 2023  
Trial Date: None

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1. I am a licensed California attorney that is admitted to practice before all state courts in California. I am counsel of record for Defendants WNU LLC dba PAPA JOHN’S, PAUL URBINA, and BRISIA OCHOA (“Defendants”) and I submit this declaration in support of the Motion for Preliminary Approval of Class Action Settlement.

3. The Claims Administrator will take additional reasonable steps, including a skip-trace or other search using the name, address, and social security number of the Class Member involved, to locate such persons for a period of up to forty-five (45) days.

4. After such time, the Claims Administrator will disburse or cause to disburse all remaining balance of Non-Reversionary Settlement Fund plus any interest on that sum at the legal rate of interest from the date of entry of the initial judgment to the Legal Aid Foundation of Los Angeles, specifically to the fund designated as “Legal Aid Foundation of Los Angeles, General Support.”

5. The Legal Aid Foundation of Los Angeles is a nonprofit organization which promotes justice and the law for all Californians.

7. I am not aware that any party or counsel in this case has an interest or involvement in the  
ance work of this *cy pres* recipient.

I, Karen Luh, certify and declare under penalty of perjury that the above information is true and correct to the best of my knowledge, information and belief, and that this

*[Handwritten signature]*

Karen Luh

**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

**CASE NAME: SALVADOR RODRIGUEZ, ET AL. v. WNU LLC DBA PAPA JOHNS, et al.**

**CASE NUMBER: 23STCV28934**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 725 South Figueroa Street, Suite 2500, Los Angeles, California 90017.

On June 30, 2025, I served the foregoing document described as:

**DECLARATION OF KAREN LUH REGARDING CY PRES RECIPIENT**

in this action by delivering a true copy thereof addressed as follows:

|                                                                                                                                                                                            |                                                                                                                                                                                                                                             |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Eli M. Kantor<br>Jonathan Kantor<br>Law Office of Eli Kantor<br>9595 Wilshire Blvd., Suite 405<br>Beverly Hills, California 90212<br>Telephone: (310) 274-8216<br>Facsimile (310) 273-6016 | <i>Counsel for Plaintiffs</i><br><i>SALVADOR RODRIGUEZ and GERMAN RODRIGUEZ</i><br><br>Email:<br><a href="mailto:eli@elikantorlaw.com">eli@elikantorlaw.com</a><br><a href="mailto:Jonathan@elikantorlaw.com">Jonathan@elikantorlaw.com</a> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**[X] BY CASE ANYWHERE:** Pursuant to Code of Civil Procedure §187 and California Rules of Court, Rules 2.253(a) and 3.751, and the stipulation of the parties, I caused the documents to be served via Case Anywhere.

**[X] STATE** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on June 30, 2025, at Los Angeles, California.

PAMELA TRUJILLO  
Pamela Trujillo

4924-5436-4498, v. 1