

1 **JUSTICE FOR WORKERS, P.C.**

William C. Sung SB# 280792

2 E-Mail: william@justiceforworkers.com

Tiffany L. Luu SB# 335127

3 E-Mail: tluu@justiceforworkers.com

Joseph C. Ramli SB# 339491

4 E-Mail: jramli@justiceforworkers.com

3600 Wilshire Boulevard, Suite 1815

5 Los Angeles, CA 90010

Tel: 323-922-2000

6 Fax: 323-922-2000

7 Attorneys for Plaintiff JUAN ARIAS

8
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF ORANGE**

11 JUAN ARIAS, an aggrieved employee and on
12 behalf of other aggrieved employees;

13 Plaintiff,

14 vs.

15 CONTACTABILITY.COM LLC, an Ohio
16 limited liability company; and DOES 1 through
50,

17 Defendants.

Case No.: 30-2023-01352000-CU-OE-CXC

[Assigned for All Purposes to:
Hon. Layne H. Melzer, Dept. CX102]

**DECLARATION OF TIFFANY L. LUU IN
SUPPORT OF MOTION FOR
APPROVAL OF PAGA SETTLEMENT,
ATTORNEY'S FEES AND COSTS, AND
ENHANCEMENT AWARD**

(Filed Concurrently with Notice of Motion
and Motion for Approval of PAGA
Settlement; Supporting Declarations and
[Proposed] Judgment and Order)

DATE: February 5, 2026

TIME: 2:00 p.m.

DEPT: CX102

Reservation No: 74663736

Action Filed: September 29, 2023

Trial Date: Not Set

1 I, Tiffany L. Luu, hereby declare as follows:

2 1. I am an attorney licensed to practice law in the state of California and have been
3 admitted to practice before this Court. I am an attorney with the law firm of Justice for Workers,
4 P.C., counsel of record for Plaintiff Juan Arias (“Plaintiff”) in this action. I am one of the lawyers
5 responsible for representing Plaintiff in this case and I have personal knowledge of the matters
6 stated herein and if called and sworn as a witness, I would and could competently testify under oath
7 thereto.

8 2. My qualifications are as follows: I received my J.D., *cum laude*, along with my
9 Master of Dispute Resolution, from the Pepperdine University Rick J. Caruso School of Law in
10 2020. I was named to the Dean’s Honor List in 2019. During law school, I served as the Student
11 Articles Editor of the Pepperdine Dispute Resolution Law Journal where I published the article:
12 *California: A New Golden Hub of International Commercial Arbitration?*, Pepperdine Dispute
13 Resolution Law Journal, Volume 20:2 (May 2020). I also served as the President of the Asian
14 Pacific American Law Student Association. I received two CALI Excellence for the Future Awards
15 for obtaining the highest grade in two law school courses. I also served as a summer law clerk for
16 the Orange County Public Defender’s office and for the Law Office of Paul J. Barba, wherein I
17 defended an employer from employment claims brought by the U.S. Equal Employment
18 Opportunity Commission. I also served as a summer law clerk for the Beverly Hills office of
19 Arendsen Cane Molnar LLP and later became a litigation associate after passing the California Bar
20 in January 2021, wherein I served as second-chair trial counsel representing an employee in a wage
21 and hour dispute and represented an employer in a California Private Attorneys General Act
22 (“PAGA”) action.

23 3. I practiced as a labor and employment associate for the next 3 years representing
24 employers in wage and hour class and/or PAGA actions, including at Lewis Brisbois Bisgaard &
25 Smith LLP and Fisher & Phillips LLP.

26 4. In January 2024, I joined Justice for Workers, P.C. (“JFW”) and as an associate in
27 the Complex Litigation Practice Group, where I focus my practice on representing employees in
28 wage and hour class and PAGA action lawsuits.

1 5. My primary practice has been employment law throughout my entire legal career. I
2 have handled a number of wage and hour matters, including individual actions and class and/or
3 PAGA actions, on behalf of plaintiffs and defendants. The following is a list of wage and hour
4 class and/or PAGA actions where I served as defense counsel and in which final settlement
5 approval was granted: *Sylvia Martinez v. CCS Engineering Fresno, Inc., et al.*, Los Angeles
6 Superior Court, No. 22STCV14985, filed May 4, 2022 (PAGA settlement approved on May 13,
7 2023); *Quesada v. California Commerce Club, Inc.*, Los Angeles Superior Court, No.
8 19STCV41482, filed November 18, 2019 (PAGA settlement approved on November 17, 2021); and
9 *Alfonso Valadez v. California Commerce Club, Inc.*, Los Angeles Superior Court, No. BC644587,
10 filed December 20, 2016 (PAGA settlement approved on December 17, 2021).

11 6. In my current practice at JFW, I serve as plaintiff's counsel on over 100 pending
12 class and/or PAGA actions. In addition to this matter, I have resolved over 20 other class and/or
13 PAGA actions at mediation which are in varying stages of settlement approval or negotiating the
14 long-form class and PAGA settlement agreement. The following are cases in which I have received
15 preliminary or final approval of class action settlement and I was appointed as class counsel: *Jose*
16 *Regalado v. United Markets*, Marin County Superior Court Case No. CV0001169, final approval of
17 class/PAGA settlement granted on August 29, 2025; *Irene Eunhee Ikuta v. TAKEE International,*
18 *Inc.*, Los Angeles Superior Court, Case No. 23STCV21120, preliminary approval of class/PAGA
19 settlement granted on August 27, 2025; *Mushfiqur Chowdhury v. CWT US, LLC*, Los Angeles
20 Superior Court Case No. 23STCV25373, final approval of class/PAGA settlement granted on
21 August 22, 2025; *Pedro Hernandez v. Edmund A. Gray Co.*, Los Angeles Superior Court Case No.
22 24STCV04118, final approval of class/PAGA settlement granted on August 19, 2025; *Poul Bedri v.*
23 *City of Hope National Medical Center*, Los Angeles Superior Court Case No. 23STCV23713,
24 preliminary approval of class/PAGA settlement granted on August 19, 2025; *Linda Salazar Ayala v.*
25 *Applied Membranes, Inc.*, San Diego Superior Court, Case No. 37-2023-00054420-CU-OE-CTL,
26 preliminary approval of class/PAGA action settlement granted on August 15, 2025; *Shayne Alissa*
27 *Werber v. Teleferic Barcelona LA LLC, et al.*, Los Angeles Superior Court Case No.
28 23STCV25517, preliminary approval of class/PAGA action settlement granted on August 14, 2025;

1 *Pedro Hernandez v. Steps Apparel Group, Inc., et al.*, Los Angeles Superior Court Case No.
2 23STCV27883, approval of PAGA settlement granted on August 13, 2025; *Doelisha Kelly v. Pan*
3 *American Properties, Inc.*, Orange County Superior Court Case No. 30-2023-01362739-CU-OE-
4 CXC, approval of PAGA settlement granted on July 11, 2025; *Alexis Bartram v. Lakeshore*
5 *Learning Materials, LLC*, Los Angeles Superior Court Case No. 23STCV21174, final approval of
6 class/PAGA settlement granted on July 3, 2025; *Randall Bachman v. Geodis Logistics LLC*,
7 Riverside Superior Court, Case No. CVRI2400956, final approval of class/PAGA settlement
8 granted on June 25, 2025; *Chinyere Ezekwesili v. Vermont HealthCare Center LLC*, Los Angeles
9 Superior Court Case No. 24STCV17871, approval of PAGA settlement granted on June 11, 2025;
10 *Jorge Nieto v. Pick-Your-Part Auto Wrecking*, Riverside Superior Court Case No. CVRI2402255,
11 approval of PAGA settlement granted on May 29, 2025; *Ted Kim v. Hyundai America Technical*
12 *Center, Inc.*, San Bernardino Superior Court Case No. CIVSB2326861, approval of PAGA
13 settlement granted on May 21, 2025; *Eric Echeverria v. Fireclay Tile Inc.*, San Benito Superior
14 Court Case No. CU-23-00249, final approval of class/PAGA settlement granted on May 7, 2025;
15 *Isaias Velasco v. Nature's Produce*, Los Angeles County Superior Court Case No. 23STCV23811,
16 approval of PAGA settlement granted on April 29, 2025; *Norma Borquez v. Smart Metals Recycling*
17 *LLC*, Yolo Superior Court Case No. CV2024-0050, final approval of class/PAGA settlement
18 granted on April 4, 2025; *Juan Hinojos Campos v. Applied Technology Group, Inc.*, Kern Superior
19 Court Case No. BCV-23-103067, final approval of class/PAGA settlement granted on March 11,
20 2025; *Dennisha Lampkin v. Sunstates Security, Inc.*, Riverside Superior Court Case No.
21 CVRI2305600, final approval of class/PAGA settlement granted on December 18, 2024; *Amaya*
22 *Nelson v. Clair Global Corp.*, Los Angeles Superior Court, Case No. 24STCV14597, preliminary
23 approval of class/PAGA settlement granted on May 22, 2025.

24 7. As counsel for Plaintiff and Aggrieved Employees, I have been intimately involved
25 in every aspect of this case and I believe that the proposed PAGA settlement is a fair and equitable
26 result for Aggrieved Employees and the State.

27 ///

28 ///

1 I declare, under penalty of perjury under the laws of the State of California, that the
2 foregoing is true and correct.

3 Executed on September 21, 2025 at Los Angeles, California.

4
5 

6 _____
Tiffany L. Luu