

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

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

10 **FOR THE COUNTY OF ORANGE**

11 LAN THANH LUU, an individual and on
12 behalf of all others similarly situated;

13 Plaintiff,

14 vs.

15 GARDEN GROVE SUPERSTORE INC., a
16 California corporation; TRAN'S GROUP,
INC., a California corporation; EL MONTE
17 SUPERSTORE INC., a California corporation;
SHUN FAT SUPERMARKET INC., a
18 California corporation; WESTMINSTER
SUPERSTORE, LLC, a California limited
19 liability company; SF SAN DIEGO INC., a
California corporation; SAN PABLO
20 SUPERMARKET, INC., a California
corporation; STOCKTON SUPERMARKET,
21 INC., a California corporation; SF
22 SUPERMARKET FRESNO, INC., a
California corporation; SF SUPERMARKET,
23 Inc., a California corporation; and DOES 1
24 through 50,

25 Defendants.

Case No.: 30-2023-01351037-CU-OE-CXC

[Assigned for All Purposes to:
Hon. David Hoffer, Dept. CX103

**DECLARATION OF LAN THANH 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: November 30, 2026

TIME: 1:30 p.m.

DEPT: CX103

Reservation ID: 74957928

Action Filed: September 25, 2023

Trial Date: Not Set

1 I, LAN THANH LUU, hereby declare as follows:

2 1. I am an individual over the age of 18 year and the named Plaintiff in the above-
3 captioned matter. This declaration is submitted in support of approval of the proposed PAGA action
4 settlement ("Settlement") reached in this case. I have personal knowledge of the facts contained in
5 this declaration, and if called as a witness, could and would testify as to their accuracy.

6 2. I was employed by Defendants as an hourly-paid, non-exempt cashier from
7 approximately January 2022 to September 2022 at their supermarket in Garden Grove, California.
8 During my employment with Defendant, I was subject to Defendant's wage and hour policies and
9 practices that are at issue in this case.

10 3. Specifically, I did not receive any meal breaks despite regularly working more than 5
11 hours in a shift, I did not receive all of my wages when I worked as a trainee in the beginning of my
12 employment, my wages were deducted when I accidentally accepted counterfeit currency, my rest
13 breaks were sometimes interrupted by work and customer needs, and I had to purchase counterfeit
14 detector pens for work without reimbursement. I believe other non-exempt employees of Defendant
15 were subject to the same policies and procedures discussed above.

16 4. I have been actively involved in this case since I first retained Justice for Workers,
17 P.C. ("JFW") in August 2023. Without waiving the attorney-client privilege, prior to filing this
18 lawsuit, my attorneys explained my role and responsibilities as a class and PAGA representative,
19 and I understand my responsibilities as a class and PAGA representative. Since retaining my
20 attorneys, I have had many discussions with the attorneys and staff at JFW, including discussions
21 regarding Defendant's wage and hour practices and my claims in this case, potential witnesses,
22 litigation strategy, updates on how the case was proceeding, the settlement, and how I could help
23 the case and other employees. I also gathered and reviewed documents for use in the lawsuit and
24 reviewed relevant documents with my attorneys. I estimate that I have spent at least 20 hours on this
25 case from the time I first spoke with my attorneys regarding this case until the present. I also
26 understand that as part of the settlement, I have agreed to a general release of claims against
27 Defendants, which is broader than the release of claims agreed to by other employees. As far as I
28 am aware, I have no actual or potential conflicts with any Aggrieved Employees.

5. I understand that my attorneys will request that the Court approve a service award of \$5,000 for my efforts on behalf of the State and Aggrieved Employees. I believe this amount is reasonable based on the amount of time and effort I have devoted to this case and the risks I have undertaken as a PAGA representative, as described above. My support for the Settlement is not contingent on my receiving this enhancement award.

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

Executed on August 26, 2026 at Garden Grove, California.


LAN THANH LUU