

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

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

9 **FOR THE COUNTY OF SANTA CLARA**

11 DAVID ISAAC TOBAR ORTIZ, an individual
12 and on behalf of all others similarly situated;

13 Plaintiff,

14 vs.

15 EPICUREAN GROUP, a California
16 corporation; and DOES 1 through 50,

17 Defendants.

Case No.: 23CV424299

[Assigned for All Purposes to:
Hon. Beth McGowen, Dept. 22]

**DECLARATION OF TIFFANY L. LUU IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

(Filed concurrently with Motion for
Preliminary Approval; Supporting
Declarations; and [Proposed] Order)

DATE: June 25, 2026

TIME: 1:30 p.m.

DEPT: 22

Action Filed: October 17, 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 David Isaac Tobar Ortiz (“Plaintiff”) in this action. I am one of
5 the lawyers responsible for representing Plaintiff in this case and I have personal knowledge of the
6 matters stated herein and if called and sworn as a witness, I would and could competently testify
7 under oath 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 the plaintiff's counsel on over 100 pending
12 class and/or PAGA actions. The following are cases in which I have received final approval of class
13 action settlement and I was appointed as class counsel: *Darcy Nuber v. Fever Labs, Inc.*, Los
14 Angeles Superior Court, Case No. 23STCV21796, final approval of class/PAGA settlement granted
15 on March 30, 2026; *Cesar Tate v. St. Distributing Co., LLC*, Los Angeles Superior Court Case No.
16 23STCV22743, final approval of class/PAGA settlement granted on February 11, 2026; *Andrew*
17 *Carmona v. Western Holdings Group dba Los Angeles Property Management Group*, Los Angeles
18 Superior Court, Case No. 23STCV24028, final approval of class/PAGA settlement granted on
19 January 29, 2026; *Poul Bedri v. City of Hope National Medical Center*, Los Angeles Superior
20 Court, Case No. 23STCV23713, final approval of class/PAGA settlement granted on January 28,
21 2026; *Irene Eunhee Ikuta v. TAKEE International, Inc.*, Los Angeles Superior Court, Case No.
22 23STCV21120, final approval of class/PAGA settlement granted on January 22, 2026; *Amourafina*
23 *Burton v. Trove Recommerce, Inc.*, San Mateo Superior Court, Case No. 23-CIV-06108, final
24 approval of class/PAGA settlement granted on January 9, 2026; *Shayne Werber v. Teleferic*
25 *Barcelona*, Los Angeles Superior Court Case No. 23STCV25517, final approval of class/PAGA
26 settlement granted on December 17, 2025; *Linda Salazar Ayala v. Applied Membranes, Inc.*, San
27 Diego Superior Court Case No. 37-2023-00054420-CU-OE-CTL, final approval of class/PAGA
28 settlement granted on December 5, 2025; *Justin Le, et al. v. Dragonfly Tea Bar LLC, et al.*, Los

1 Angeles Superior Court Case No. 23STCV26247, final approval of class/PAGA settlement granted
2 on October 29 2025; *Ryan Lukman v. Safe Haven Security Services, LLC*, Riverside County
3 Superior Court, Case No. CVRI2400777, final approval of class/PAGA settlement granted on
4 October 1, 2025; *Amaya Nelson v. Clair Global Corp.*, Los Angeles Superior Court, Case No.
5 24STCV14597, final approval of class/PAGA settlement granted on May 22, 2025; *Jose Regalado*
6 *v. United Markets*, Marin County Superior Court Case No. CV0001169, final approval of
7 class/PAGA settlement granted on August 29, 2025; *Mushfiqur Chowdhury v. CWT US, LLC*, Los
8 Angeles Superior Court Case No. 23STCV25373, final approval of class/PAGA settlement granted
9 on August 22, 2025; *Pedro Hernandez v. Edmund A. Gray Co.*, Los Angeles Superior Court Case
10 No. 24STCV04118, final approval of class/PAGA settlement granted on August 19, 2025; *Alexis*
11 *Bartram v. Lakeshore Learning Materials, LLC*, Los Angeles Superior Court Case No.
12 23STCV21174, final approval of class/PAGA settlement granted on July 3, 2025; *Randall Bachman*
13 *v. Geodis Logistics LLC*, Riverside Superior Court, Case No. CVRI2400956, final approval of
14 class/PAGA settlement granted on June 25, 2025; *Eric Echeverria v. Fireclay Tile Inc.*, San Benito
15 Superior Court Case No. CU-23-00249, final approval of class/PAGA settlement granted on May 7,
16 2025; *Norma Borquez v. Smart Metals Recycling LLC*, Yolo Superior Court Case No. CV2024-
17 0050, final approval of class/PAGA settlement granted on April 4, 2025; *Juan Hinojos Campos v.*
18 *Applied Technology Group, Inc.*, Kern Superior Court Case No. BCV-23-103067, final approval of
19 class/PAGA settlement granted on March 11, 2025; *Dennisha Lampkin v. Sunstates Security, Inc.*,
20 Riverside Superior Court Case No. CVRI2305600, final approval of class/PAGA settlement granted
21 on December 18, 2024.

22 7. As counsel for Plaintiff and the proposed Class, I have been intimately involved in
23 every aspect of this case from its inception through the present. There is no conflict between my
24 interests and the interests of the Class that I am seeking to represent. I have demonstrated my ability
25 to advocate for the interests of the Class by initiating this litigation, undertaking extensive class
26 discovery, negotiating the proposed Settlement at mediation, seeking preliminary approval, and
27 otherwise litigating this case.

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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 June 1, 2026 at Los Angeles, California.

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Tiffany L. Luu