

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

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6 Attorneys for Plaintiff DOELISHA KELLY

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

9 **FOR THE COUNTY OF ORANGE**

10 DOELISHA KELLY, an individual and on
11 behalf of all others similarly situated;

12 Plaintiff,

13 vs.

14 PAN AMERICAN PROPERTIES, INC., a
15 California corporation; and DOES 1 through
50,

16 Defendants.

Case No.: 30-2023-01362739-CU-OE-CXC

[Assigned for All Purposes to:
Hon. William Claster, Dept. CX101]

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

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

DATE: May 16, 2025

TIME: 9:00 a.m.

DEPT: CX101

RESERVATION NO: 74540726

Action Filed: November 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 Ted Kim (“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:
16 *Dennisha Lampkin v. Sunstates Security, Inc.*, Riverside Superior Court Case No. CVRI2305600,
17 final approval granted on December 18, 2024; *Juan Hinojos Campos v. Applied Technology Group,*
18 *Inc.*, Kern Superior Court Case No. BCV-23-103067, final approval granted on March 11, 2025;
19 *Eric Echeverria v. Fireclay Tile Inc.*, San Benito Superior Court Case No. CU-23-00249,
20 preliminary approval granted on October 9, 2024; *Norma Borquez v. Smart Metals Recycling LLC,*
21 *Yolo Superior Court Case No. CV2024-0050*, preliminary approval granted on November 5, 2024;
22 *Randall Bachman v. Geodis Logistics LLC*, Riverside Superior Court, Case No. CVRI2400956,
23 preliminary approval granted on January 22, 2025; *Alexis Bartram v. Lakeshore Learning*
24 *Materials, LLC*, Los Angeles Superior Court Case No. 23STCV21174, preliminary approval
25 granted on March 5, 2025; *Mushfiqur Chowdhury v. CWT US, LLC*, Los Angeles Superior Court
26 Case No. 23STCV25373, preliminary approval granted on March 24, 2025; *Jose Regalado v.*
27 *United Markets*, Marin County Superior Court Case No. CV0001169, preliminary approval granted
28 on March 28, 2025; *Pedro Hernandez v. Edmund A. Gray Co.*, Los Angeles Superior Court Case

1 No. 24STCV04118, preliminary approval granted on April 9, 2025.

2 7. As counsel for Plaintiff and Aggrieved Employees, I have been intimately involved
3 in every aspect of this case and I believe that the proposed PAGA settlement is an excellent result
4 for Aggrieved Employees and the State.

5 8. Enclosed as Exhibit 6 to the Declaration of William Sung is a true and correct copy
6 of my time log.

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

9 Executed on April 18, 2025 at Los Angeles, California.

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Tiffany L. Luu