

Amy S. Ramsey (SBN 315981)
ADVANTAGE ADVOCATES, P.C.
21 Miller Alley, Suite 56
Pasadena, CA 91103
Telephone: (626) 310-0100
Fax: (626) 310-0103
Email: aramsey@advantage-law.com

William E. Stoner (SBN 101418)
STONER CARLSON LLP
301 E. Colorado Blvd., Suite 320
Pasadena, CA 91101
Telephone: (213) 687-2640
Facsimile: (213) 687-2644
Email: wstoner@stonercarlson.com

Attorneys for Plaintiff
LUKAS NOURI

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

LUKAS NOURI, ON BEHALF OF HIMSELF AND
THE AGGRIEVED EMPLOYEES,

Case No.: 24STCV01585

Plaintiff,

vs.

SUNSET ATHLETIC CLUB, LLC (a
California limited liability company) dba
MONARCH; RYAN GREENE (an
individual); and MONARCH BRENTWOOD LLC
(a California limited liability company),
Defendants.

**DECLARATION OF LUKAS NOURI
IN SUPPORT OF STIPULATION TO
APPROVE PAGA SETTLEMENT**

I, Lukas Nouri, declare as follows:

1. I am the Plaintiff and PAGA Representative in the matter of Nouri v. Sunset Athletic Club, LLC et al., Superior Court of the State of California, County of Los Angeles, Case No. 24STCV01585. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, I could and would competently testify to these facts.

2. I confirm my willingness to serve as the Plaintiff and PAGA Representative in this matter. I understand the responsibilities associated with this role, including representing the interests of the Aggrieved Employees in pursuing claims under the Private Attorneys General Act

1 (PAGA) and ensuring the fair and equitable administration of the Settlement.

2 3. I affirm that I am competent to serve as the Plaintiff and PAGA Representative in
3 this matter. I have actively participated in the litigation process, including providing information
4 and assistance to my counsel, reviewing relevant documents, attending depositions, and engaging
5 in settlement discussions.

6 4. I understand the terms of the Settlement Agreement and the obligations it imposes
7 on all Parties.

8 5. I declare that I have no actual or potential conflicts of interest with the Aggrieved
9 Employees or the Settlement Administrator, ILYM Group, Inc. Specifically:

10 a. I have no financial or personal relationships with any of the Aggrieved
11 Employees that would impair my ability to fairly represent their interests.

12 b. I have no financial or personal relationships with the Settlement
13 Administrator, ILYM Group, Inc., or its employees that would compromise
14 the impartial administration of the Settlement.

15 6. I have acted solely in the interest of the Aggrieved Employees in pursuing this
16 PAGA claim and negotiating settlement of the PAGA claim.

17 7. I am committed to ensuring that the interests of the Aggrieved Employees are fairly
18 and adequately represented throughout the settlement process. I have worked closely with my
19 counsel to achieve a resolution that is equitable and in compliance with the requirements of the
20 California Labor Code.

21 I declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct. Executed on 01/12/2026 at Woodland Hills,
23 California.

24 

25 Lukas Nouri

1 **PROOF OF SERVICE**

2 I, Amy S. Ramsey, hereby declare and state that:

3 I am over the age of eighteen years, employed in the County of Los Angeles,
4 California, and not a party to the within action. My business address is: 21 Miller Alley,
Pasadena, CA 91103.

5 On January 14, 2026, I served copies of the following document described as:

6 **DECLARATION OF LUKAS NOURI IN SUPPORT OF STIPULATION TO APPROVE
PAGA SETTLEMENT** on the interested party in this action as follows:

7 Kevin Allen

8 kallen@grsm.com

9 Debra Meppen

10 dmeppen@grsm.com

11 Michelle Smith

12 mxsmith@grsm.com

13 Neo Chen

14 neochen@grsm.com

15 Dina Glucksman

16 dglucksman@grsm.com

17 633 West 5th Street, 52nd Floor, Los Angeles, CA 90071

18 Attorneys for Defendant

19 [X] BY E-SERVICE: By transmitting via email, per CCP §1010.6

20 [] BY MAIL: I am readily familiar with our business practice for collecting, processing
21 and mailing correspondence and pleadings with the United States Postal Service. Such
22 correspondence and pleadings are deposited with the United States Postal Service on the
23 same day that they are placed for mailing in the ordinary course of business. I sealed each
24 envelope and, with postage thereon fully prepaid, placed it for mailing in accord with our
25 business' practice. (C.C.P § 1013(a) and (b))

26 [] BY UNITED PARCEL SERVICE: I caused such envelope(s) to be placed in the UPS
27 Express repository at , California, which provides for next business day delivery on the above
28 addresses by placing a true copy thereof enclosed in a sealed envelope addressed as per
above.

[] BY PERSONAL SERVICE: I caused such envelope to be delivered on the above
addresses by a process server employed by .

[] VIA FACSIMILE: I faxed said document, to the office(s) of the addressee(s) shown
above, and the transmission was reported as complete and without error.

I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct. Executed on January 14, 2026 at Pasadena, California.

26 
27 Amy S. Ramsey