

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

3600 Wilshire Boulevard, Suite 1815

4 Los Angeles, CA 90010

Tel: 323-922-2000

5 Fax: 323-922-2000

6 Attorneys for Plaintiff NORMA BORQUEZ

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF YOLO**

10 NORMA BORQUEZ, an individual and on
11 behalf of all others similarly situated;

12 Plaintiff,

13 vs.

14 SMART METALS RECYCLING LLC, a
15 Limited Liability Company; and DOES 1
through 50,

16 Defendants.

Case No.: CV2024-0050

[Assigned for All Purposes to:
Hon. Samuel T. McAdam, Dept. 14]

**DECLARATION OF WILLIAM C. SUNG
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

(Filed concurrently with Motion for
Preliminary Approval of Class Action
Settlement; Declarations of William C. Sung,
Norma Borquez, and Jodey Lawrence; and
[Proposed] Order)

DATE: November 5, 2024

TIME: 9:00 a.m.

DEPT.: 14

Action Filed: January 3, 2024

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 in this action. I am one of the lawyers responsible for
5 representing Plaintiff in this case and I have personal knowledge of the matters stated herein and if
6 called and sworn as a witness, I would and could competently testify under oath thereto.

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

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

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

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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 75 pending class
12 and/or PAGA actions. In addition to this matter, I have six other class and/or PAGA actions resolve
13 at mediation. On August 2, 2024, Judge Harold W. Hopp of the Riverside County Superior Court
14 granted preliminary approval of class settlement and appointed me as co-class counsel in *Lampkin*
15 *v. Sunstates Security, Inc.*, Case No. CVRI2305600. The remaining matters are pending preliminary
16 approval or in the pre-motion for preliminary approval process of negotiating the long-form class
17 and PAGA settlement agreements.

18 7. As counsel for Plaintiff and the proposed Class, I have been intimately involved in
19 every aspect of this case from its inception through the present. The details of the work completed
20 in this case by me and the other attorneys in my firm are set forth in the declaration of William C.
21 Sung filed concurrently herewith.

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

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Executed on October 8, 2024 at Los Angeles, California.



Tiffany L. Luu