

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
12 OXENI JUAREZ DE LA CRUZ, an individual
and on behalf of all others similarly situated;

13
14 Plaintiff,

15 vs.

16 LAGUNA COOKIE COMPANY INC., a
California corporation; D.F. STAUFFER
17 BISCUIT CO., INC., a Pennsylvania
corporation; and DOES 1 through 50,

18
19 Defendants.

Case No.: 30-2024-01381818-CU-OE-CXC

[Assigned for All Purposes to:
Hon. Melissa R. McCormick, Dept. CX104]

**DECLARATION OF OXENI JUAREZ DE
LA CRUZ 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: January 8, 2026

TIME: 2:00 p.m.

DEPT: CX105

Reservation ID: 74721525

Action Filed: February 26, 2024

Trial Date: Not Set

1 I, Oxeni Juarez De La Cruz, 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 class 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 directly employed by Defendant Laguna Cookie Company, Inc. (“Defendant”)
7 as an hourly-paid, non-exempt employee from approximately April 2021 to approximately March
8 13, 2024. During my employment with Defendant, I was subject to Defendant’s wage and hour
9 policies and practices that are at issue in this case.

10 3. Specifically, Defendant paid me shift differentials, but I believe Defendant didn’t
11 include the shift differentials in my meal period premium and rest period premium rates of pay.
12 Additionally, my wage statements identified “DF Stauffer Biscuit Co, Inc.” instead of “Laguna
13 Cookie Company Inc.” as my employer and “PO Box 12002 York, PA 17402” as my employer’s
14 address. As a result of these issues, I believe I was provided inaccurate wage statements and was not
15 paid all wages due to me. I believe other non-exempt employees of Defendant were subject to the
16 same policies and procedures discussed above and that my claims against Defendant for unpaid
17 wages and statutory and civil penalties are typical of Class Members’ claims.

18 4. I have been actively involved in this case since I first retained Justice for Workers,
19 P.C. (“JFW”) in October 2023. Without waiving the attorney-client privilege, prior to filing this
20 lawsuit, my attorneys explained my role and responsibilities as a Class Representative, and I
21 understand my responsibilities as a Class Representative. Since retaining my attorneys, I have had
22 many discussions and meetings with the attorneys and staff at JFW, discussions regarding
23 Defendant’s wage and hour practices and my claims in this case, litigation strategy, updates on how
24 the case was proceeding, the Settlement, and how I could help the case and potential Class
25 Members. I also gathered and reviewed documents for use in the lawsuit and reviewed relevant
26 documents with my attorneys. I estimate that I have spent at least 20 hours on this case from the
27 time I first spoke with my attorneys regarding this case until the present. I also understand that as
28 part of the Settlement, I have agreed to a general release of claims against Defendant, which is

1 broader than the release of claims agreed to by other Class Members.

2 5. Furthermore, there is no conflict between my interests and the interests of the class
3 that I am seeking to represent. My interests are entirely coextensive with the interests of the Class. I
4 allege that I was injured by the same company-wide policies and practices to which the proposed
5 Class was subjected and seek the same relief. I have already demonstrated my ability to advocate
6 for the interests of the Class by initiating this litigation, undertaking extensive class discovery, and
7 evaluating the proposed settlement to assure that it is fair.

8 6. I understood that at the time I filed this action, as a Class Representative, I owed a
9 duty to the putative class members to faithfully prosecute this action with their best interests at the
10 forefront of every decision. I understood that I could not make any decision in this action for the
11 sole benefit of my personal interest. I understood that in executing this duty, I might have been
12 asked to sacrifice my personal best interests for the benefit of the interests of the putative class
13 members. Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the
14 broadest possible relief for my former co-workers for what I perceived to be Defendant's unlawful
15 wage and hour practices. I believe that I faithfully executed the duties of a Class Representative
16 throughout this litigation and will continue to do until this litigation is fully and finally resolved.
17 Furthermore, I was a current employee when this case was filed and I took the risk of being
18 retaliated against by Defendant when I filed this action.

19 7. I understand that my attorneys will request that the Court approve a service award
20 of \$7,500.00 for my efforts on behalf of the Class. I believe this amount is reasonable based on the
21 amount of time and effort I have devoted to this case, the risks I have undertaken as a Class
22 Representative, and my general release of claims, as described above. My support for the Settlement
23 is not contingent on my receiving this service award.

24 8. I do not have any conflict of interest with the proposed Administrator, Apex Class
25 Action LLC. I am not aware of any other pending matter or action asserting claims that will be
26 extinguished or affected by the Settlement.

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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 December 1, 2025 at Santa Ana, California.
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Oxeni Juarez De La Cruz
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