

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. CX105]

**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: January 8, 2026

TIME: 2:00 p.m.

DEPT: CX105

Reservation ID: 74721525

Action Filed: February 26, 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 Oxeni Juarez De La Cruz (“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 plaintiff's counsel on over 100 pending
12 class and/or PAGA actions. In addition to this matter, I have resolved over 50 other class and/or
13 PAGA actions at mediation. The following are cases in which I have received final approval of
14 class action and/or PAGA settlement and I was appointed as class and/or PAGA counsel: *Hai Luu v.*
15 *Cambro Manufacturing Co.*, Orange County Superior Court, Case No. 30-2024-01389852-CU-OE-
16 CXC, approval of PAGA settlement granted on November 7, 2025; *Justin Le, et al. v. Dragonfly*
17 *Tea Bar LLC, et al.*, Los Angeles Superior Court Case No. 23STCV26247, final approval of
18 class/PAGA settlement granted on October 29 2025; *Ryan Lukman v. Safe Haven Security Services,*
19 *LLC*, Riverside County Superior Court, Case No. CVRI2400777, final approval of class/PAGA
20 settlement granted on October 1, 2025; *Amaya Nelson v. Clair Global Corp.*, Los Angeles Superior
21 Court, Case No. 24STCV14597, final approval of class/PAGA settlement granted on May 22, 2025;
22 *Jose Regalado v. United Markets*, Marin County Superior Court Case No. CV0001169, final
23 approval of class/PAGA settlement granted on August 29, 2025; *Mushfiqur Chowdhury v. CWT US,*
24 *LLC*, Los Angeles Superior Court Case No. 23STCV25373, final approval of class/PAGA
25 settlement granted on August 22, 2025; *Pedro Hernandez v. Edmund A. Gray Co.*, Los Angeles
26 Superior Court Case No. 24STCV04118, final approval of class/PAGA settlement granted on
27 August 19, 2025; *Pedro Hernandez v. Steps Apparel Group, Inc., et al.*, Los Angeles Superior Court
28 Case No. 23STCV27883, approval of PAGA settlement granted on August 13, 2025; *Doelisha*

1 *Kelly v. Pan American Properties, Inc.*, Orange County Superior Court Case No. 30-2023-
2 01362739-CU-OE-CXC, approval of PAGA settlement granted on July 11, 2025; *Alexis Bartram v.*
3 *Lakeshore Learning Materials, LLC*, Los Angeles Superior Court Case No. 23STCV21174, final
4 approval of class/PAGA settlement granted on July 3, 2025; *Randall Bachman v. Geodis Logistics*
5 *LLC*, Riverside Superior Court, Case No. CVRI2400956, final approval of class/PAGA settlement
6 granted on June 25, 2025; *Chinyere Ezekwesili v. Vermont HealthCare Center LLC*, Los Angeles
7 Superior Court Case No. 24STCV17871, approval of PAGA settlement granted on June 11, 2025;
8 *Jorge Nieto v. Pick-Your-Part Auto Wrecking*, Riverside Superior Court Case No. CVRI2402255,
9 approval of PAGA settlement granted on May 29, 2025; *Ted Kim v. Hyundai America Technical*
10 *Center, Inc.*, San Bernardino Superior Court Case No. CIVSB2326861, approval of PAGA
11 settlement granted on May 21, 2025; *Eric Echeverria v. Fireclay Tile Inc.*, San Benito Superior
12 Court Case No. CU-23-00249, final approval of class/PAGA settlement granted on May 7, 2025;
13 *Isaias Velasco v. Nature's Produce*, Los Angeles County Superior Court Case No. 23STCV23811,
14 approval of PAGA settlement granted on April 29, 2025; *Norma Borquez v. Smart Metals Recycling*
15 *LLC*, Yolo Superior Court Case No. CV2024-0050, final approval of class/PAGA settlement
16 granted on April 4, 2025; *Juan Hinojos Campos v. Applied Technology Group, Inc.*, Kern Superior
17 Court Case No. BCV-23-103067, final approval of class/PAGA settlement granted on March 11,
18 2025; *Dennisha Lampkin v. Sunstates Security, Inc.*, Riverside Superior Court Case No.
19 CVRI2305600, final approval of class/PAGA settlement granted on December 18, 2024.

20 7. As counsel for Plaintiff and the proposed Class, I have been intimately involved in
21 every aspect of this case from its inception through the present. There is no conflict between my
22 interests and the interests of the Class that I am seeking to represent. I have demonstrated my ability
23 to advocate for the interests of the Class by initiating this litigation, undertaking extensive class
24 discovery, negotiating the proposed Settlement at mediation, seeking preliminary approval, and
25 otherwise litigating this case. I also do not have any conflict of interest with the Administrator.

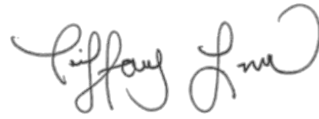
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1 I declare, under penalty of perjury under the laws of the State of California, that the
2 foregoing is true and correct.

3 Executed on December 5, 2025 at Los Angeles, California.

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Tiffany L. Luu