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17 *[Additional Counsel Next Page]*

18 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
19 **FOR THE COUNTY OF SAN BERNARDINO**

20 SHANE GREENE, ALEX FERNANDEZ,
21 DAVID STANLEY, EDDIE RUSTRIAN,
22 and JENNY LINARES, individually, and on
23 behalf of all others similarly situated,

24 *Plaintiffs,*

25 v.

26 DOLLAR TREE DISTRIBUTION, INC., a
27 Virginia corporation; and DOES 1 through
28 10, inclusive,

Defendants.

Case No. CIVSB2420954

*[Assigned for All Purposes to the Nicole Quintana
Winter, Dept. S29]*

**DECLARATION OF WILLIAM C. SUNG IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Preliminary Approval Hearing:

Date: September 30, 2026

Time: 9:00 a.m.

Dept.: S29

Action Filed: June 26, 2024

1 William C. Sung (SBN 280792)

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2 Tiffany L. Luu (SBN 335127)

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

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7 Attorneys for Plaintiff ARIANNA JACOBO

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1 I, William C. Sung, 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 ARIANNA JACOBO (“Plaintiff”) in this action. I am lead
5 counsel for 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 follow: I received my J.D. from the University of Southern
8 California Gould School of Law in 2011. During law school, I served as the Senior Content Editor
9 on the Southern California Law Review where I published the article: *Taking the Fight Back to Title*
10 *VII: A Case for Redefining “Because of Sex” to Include Gender Stereotypes, Sexual Orientation,*
11 *and Gender Identity*, Southern California Law Review, Volume 84:2 (Jan. 2011). During law
12 school, I also served as a judicial extern to U.S. Ninth Circuit Judge, Hon. Kim M. Wardlaw, and
13 U.S. Bankruptcy Court Judge, Hon. Ernest M. Robles; served as a law clerk to the General Counsel
14 of JM Eagle; and participated in the law school’s Employer Legal Advice Clinic.

15 3. After passing the California Bar in December 2011, I began practicing management-
16 side employment law at the Los Angeles office of Lewis Brisbois Bisgaard & Smith LLP. In 2013, I
17 began focusing my practice at Lewis Brisbois on representing employers in wage and hour class and
18 PAGA action lawsuits. In January 2017, I was elevated to the position of Partner and Vice Chair of
19 Lewis Brisbois’ Wage & Hour Class Action Practice Group. In November 2020, I was elevated as
20 the Co-Chair of Lewis Brisbois Wage & Hour Class Action Practice Group, becoming one of the
21 youngest attorneys to chair a practice group at the firm. In January 2022, I was voted in as an equity
22 partner, becoming one of the youngest equity partners and the third Asian-American equity partner
23 in the history of this 1,500-attorney firm.

24 4. In July 2023, I joined Justice for Workers, P.C. (“JFW”) and began heading its
25 Complex Litigation Practice Group where I focus my practice on representing employees in wage
26 and hour class and PAGA action lawsuits.

27 5. In my current practice at JFW, I serve as the lead plaintiff’s counsel on over 100
28 pending class and/or PAGA actions. In addition to this matter, my team and I have resolved over 80

1 other class and/or PAGA actions at mediation. The following are cases in which I have received
2 final approval of class action settlement and I was appointed as class counsel: *Christian Derefield v.*
3 *OHC of California*, Los Angeles Superior Court Case No. 24STCV01784, final approval of
4 class/PAGA settlement granted on August 31, 2026; *Loan Kim Phu v. MicroVention, Inc.*, Orange
5 County Superior Court Case No. 30-2024-01376392-CU-OE-CXC, final approval of class/PAGA
6 settlement granted on August 3, 2026; *Annette Dearing v. Love's Country Stores of California*,
7 Madera County Superior Court Case No. MCV090813, final approval of class/PAGA settlement
8 granted on July 27, 2026; *Marcos Beltran v. Fondomonte California LLC*, Riverside Superior Court
9 Case No. CVRI2402849, final approval of class/PAGA settlement granted on June 26, 2026;
10 *Chelsey Richardson, et al. v. Telecare Corporation*, Stanislaus County Superior Court Case No.
11 CV-24-006292, final approval of class/PAGA settlement granted on June 1, 2026; *Juan Carlos*
12 *Castellanos v. MG Drywall Construction, Inc.*, Los Angeles Superior Court Case No.
13 24STCV03488, final approval of class/PAGA settlement granted on May 27, 2026; *Doris Nathan v.*
14 *The Muller Company, LLC*, Los Angeles Superior Court Case No. 23STCV24395, final approval of
15 class/PAGA settlement granted on April 30, 2026; *Cody Yandell v. Iron Delta Security*, Los
16 Angeles Superior Court Case No. 24STCV07830, final approval of class/PAGA settlement granted
17 on April 27, 2026; *Darcy Nuber v. Fever Labs, Inc.*, Los Angeles Superior Court, Case No.
18 23STCV21796, final approval of class/PAGA settlement granted on March 30, 2026; *Cesar Tate v.*
19 *St. Distributing Co., LLC*, Los Angeles Superior Court Case No. 23STCV22743, final approval of
20 class/PAGA settlement granted on February 11, 2026; *Andrew Carmona v. Western Holdings*
21 *Group dba Los Angeles Property Management Group*, Los Angeles Superior Court, Case No.
22 23STCV24028, final approval of class/PAGA settlement granted on January 29, 2026; *Poul Bedri*
23 *v. City of Hope National Medical Center*, Los Angeles Superior Court, Case No. 23STCV23713,
24 final approval of class/PAGA settlement granted on January 28, 2026; *Irene Eunhee Ikuta v.*
25 *TAKEE International, Inc.*, Los Angeles Superior Court, Case No. 23STCV21120, final approval of
26 class/PAGA settlement granted on January 22, 2026; *Amourafina Burton v. Trove Recommerce,*
27 *Inc.*, San Mateo Superior Court, Case No. 23-CIV-06108, final approval of class/PAGA settlement
28 granted on January 9, 2026; *Shayne Werber v. Teleferic Barcelona*, Los Angeles Superior Court

1 Case No. 23STCV25517, final approval of class/PAGA settlement granted on December 17, 2025;
2 *Linda Salazar Ayala v. Applied Membranes, Inc.*, San Diego Superior Court Case No. 37-2023-
3 00054420-CU-OE-CTL, final approval of class/PAGA settlement granted on December 5, 2025;
4 *Justin Le, et al. v. Dragonfly Tea Bar LLC, et al.*, Los Angeles Superior Court Case No.
5 23STCV26247, final approval of class/PAGA settlement granted on October 29 2025; *Ryan*
6 *Lukman v. Safe Haven Security Services, LLC*, Riverside County Superior Court, Case No.
7 CVRI2400777, final approval of class/PAGA settlement granted on October 1, 2025; *Amaya Nelson*
8 *v. Clair Global Corp.*, Los Angeles Superior Court, Case No. 24STCV14597, final approval of
9 class/PAGA settlement granted on May 22, 2025; *Jose Regalado v. United Markets*, Marin County
10 Superior Court Case No. CV0001169, final approval of class/PAGA settlement granted on August
11 29, 2025; *Mushfiqur Chowdhury v. CWT US, LLC*, Los Angeles Superior Court Case No.
12 23STCV25373, final approval of class/PAGA settlement granted on August 22, 2025; *Pedro*
13 *Hernandez v. Edmund A. Gray Co.*, Los Angeles Superior Court Case No. 24STCV04118, final
14 approval of class/PAGA settlement granted on August 19, 2025; *Alexis Bartram v. Lakeshore*
15 *Learning Materials, LLC*, Los Angeles Superior Court Case No. 23STCV21174, final approval of
16 class/PAGA settlement granted on July 3, 2025; *Randall Bachman v. Geodis Logistics LLC*,
17 Riverside Superior Court, Case No. CVRI2400956, final approval of class/PAGA settlement
18 granted on June 25, 2025; *Eric Echeverria v. Fireclay Tile Inc.*, San Benito Superior Court Case
19 No. CU-23-00249, final approval of class/PAGA settlement granted on May 7, 2025; *Norma*
20 *Borquez v. Smart Metals Recycling LLC*, Yolo Superior Court Case No. CV2024-0050, final
21 approval of class/PAGA settlement granted on April 4, 2025; *Juan Hinojos Campos v. Applied*
22 *Technology Group, Inc.*, Kern Superior Court Case No. BCV-23-103067, final approval of
23 class/PAGA settlement granted on March 11, 2025; *Dennisha Lampkin v. Sunstates Security, Inc.*,
24 Riverside Superior Court Case No. CVRI2305600, final approval of class/PAGA settlement granted
25 on December 18, 2024.

26 6. Tiffany L. Luu, Esq.'s primary practice has been employment law throughout her
27 entire legal career. Ms. Luu handled a number of wage and hour matters, including individual
28 actions and class and/or PAGA actions, on behalf of plaintiffs and defendants. Ms. Luu received her

1 J.D., cum laude, along with her Master of Dispute Resolution, from the Pepperdine University Rick
2 J. Caruso School of Law in 2020. Ms. Luu practiced as a labor and employment associate for the
3 next 3 years representing employers in wage and hour class and/or PAGA actions, including at
4 Lewis Brisbois Bisgaard & Smith LLP and Fisher & Phillips LLP. In January 2024, Ms. Luu joined
5 JFW and as an associate in the Complex Litigation Practice Group, where she focuses her practice
6 on representing employees in wage and hour class and PAGA action lawsuits. Ms. Luu has been
7 appointed as class counsel in all of the class settlements referenced in Paragraph 4 above.

8 7. As counsel for Plaintiff Jacobo and the putative class, I have been intimately
9 involved in this case since its inception and I believe that the proposed class action and PAGA
10 settlement is a fair and equitable result for Class Members.

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

13 Executed on September 1, 2026 at Los Angeles, California.

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William C. Sung