

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

Joseph C. Ramli, SB# 339491

4 E-Mail: jramli@justiceforworkers.com

3600 Wilshire Boulevard, Suite 1815

5 Los Angeles, CA 90010

Tel: 323-922-2000

6 Fax: 323-922-2000

7 Attorneys for Plaintiff JACQUELYN ATILANO-BARBA

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF LOS ANGELES**

11 JACQUELYN ATILANO-BARBA, an
12 individual and on behalf of all others similarly
13 situated;

14 Plaintiff,

15 vs.

16 CONTINENTAL CURRENCY SERVICES,
17 INC., a California limited corporation; and
DOES 1 through 50,

18 Defendants.

Case No.: 24STCV10137

[Assigned for All Purposes to:
Hon. David S. Cunningham III, Dept. 11]

**DECLARATION OF JOSEPH C. RAMLI
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: May 21, 2026

TIME: 10:00 a.m.

DEPT: 11

Action Filed: April 23, 2024

Trial Date: Not Set

1 I, Joseph C. Ramli, 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 Jacquelyn Atilano-Barba (“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. from the Pepperdine University
9 Rick J. Caruso School of Law in 2021. During law school, I served as the Literary Citation Editor
10 of the Pepperdine Law Review.

11 3. Shortly after passing the California State Bar, I practiced as a labor and employment
12 associate starting in March 2022 representing employers in wage and hour class and/or PAGA
13 actions, including at Lewis Brisbois Bisgaard & Smith LLP and O’Hagan Meyer LLP.

14 4. In January 2025, I joined Justice for Workers, P.C. (“JFW”) and as an associate in
15 the Complex Litigation Practice Group, where I focus my practice on representing employees in
16 wage and hour class and PAGA action lawsuits.

17 5. My primary practice has been employment law throughout my entire legal career. I
18 have handled a number of wage and hour matters, including individual actions and class and/or
19 PAGA actions, on behalf of plaintiffs and defendants.

20 6. In my current practice at JFW, I serve as plaintiff’s counsel on over 100 pending
21 class and/or PAGA actions. In addition to this matter, I have resolved over 10 other class and/or
22 PAGA actions at mediation.

23 7. There is no conflict between my interests and the interests of the Class that I am
24 seeking to represent. I also do not have any conflict of interest with the Administrator.

25 8. I have no financial interests or involvement in the governance or work of Human
26 Rights Watch of Southern California (“HRW”), the proposed *cy pres* recipient. I am not a staff
27 member, employee, administrator, board member or otherwise have, or have had, any personal or
28 professional involvement with HRW.

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 January 17, 2026 at Los Angeles, California.

4
5 

6 _____
Joseph C. Ramli