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Attorneys for Plaintiff Leilei “Sammy” Shan

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

Leilei Shan, on behalf of himself,

Plaintiff,

vs.

Google LLC, a Delaware Limited Liability
Company, and DOES 1 through 100,
inclusive,

Defendants.

Case No. 24CV439473

**DECLARATION OF STEPHEN NOEL
ILG IN SUPPORT OF THE PARTIES’
JOINT STIPULATION AND
PROPOSED ORDER DISMISSING
PAGA CLAIM**

1 I, Stephen Noel Ilg, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California and
3 before this Court. I am an attorney with ILG Legal Office, P.C., attorneys of record for Plaintiff
4 Leilei Shan ("Plaintiff").

5 2. I have personal knowledge of the matters stated herein and, if called upon to
6 testify as a witness, could and would competently testify thereto. I submit this Declaration in
7 support of the Parties' joint stipulation to dismiss the PAGA Claim (the "Stipulation").

8 **Factual Background and Initial PAGA Allegations**

9 3. As set forth in the concurrently filed Stipulation, Plaintiff added a "PAGA" claim
10 for civil penalties pursuant to the Private Attorneys General Act (PAGA), Labor
11 Code § 2698, *et seq.*

12 4. At the inception of this case, Plaintiff's PAGA claim was predicated on the belief
13 that Defendant's alleged retaliatory conduct was part of a systemic pattern or
14 practice affecting a broad group of similarly situated employees. Based on
15 preliminary information, Plaintiff believed the facts warranted a representative
16 enforcement action.

17 **Results of Investigation**

18 5. Since the filing of the First Amended Complaint, counsel for Plaintiff has
19 conducted a diligent investigation into the representative components of the
20 PAGA claim. This investigation included several rounds of written discovery
21 request and many depositions.

22 6. Through this investigation, it has become apparent that the specific facts and
23 circumstances surrounding the alleged retaliation are highly individualized.
24 Counsel has determined that the evidence does not support a finding that a
25 "group" or "class" of aggrieved employees were subjected to similar retaliatory
26 acts in a manner that lends itself to a representative PAGA action.

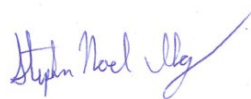
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Basis for Voluntary Dismissal

7. In the interest of judicial economy and to focus the litigation on the most viable claims, Plaintiff now seeks to voluntarily dismiss the PAGA claim with prejudice as to the named Plaintiff only and without prejudice as to any other similarly aggrieved employees.
8. No Settlement or Consideration: I hereby attest that there has been no settlement of this action, in whole or in part. No consideration—monetary or otherwise—has been given or promised by Defendant to Plaintiff or Plaintiff's counsel in exchange for the dismissal of the PAGA claim.
9. This dismissal is not the result of any "collusive" agreement. Rather, it is an independent strategic decision based solely on the Plaintiff's assessment that the PAGA claim lacks the requisite factual foundation for a representative action.
10. Concurrent with this filing, Plaintiff is providing notice of this stipulated request for dismissal to the Labor and Workforce Development Agency (LWDA) via its online filing portal, in accordance with the spirit of Labor Code § 2699(1)(2).

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

Executed at South San Francisco, California, this 27th day of February 2026.



Stephen Noel Ilg
Attorneys for Plaintiff