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Attorneys for Plaintiff TYLOR FOWLER

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

TYLOR FOWLER, an individual and on  
behalf of all others similarly situated;

Plaintiff,

vs.

SUPREME FITNESS GROUP CALI  
PAYROLL, LLC, a California limited liability  
company; and DOES 1 through 50,

Defendants.

Case No.: 24STCV17404

[Assigned for All Purposes to:  
Hon. William F. Highberger, Dept. 10]

**DECLARATION OF TYLOR FOWLER  
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: November 16, 2026  
TIME: 11:30 a.m.  
DEPT: 10

Action Filed: July 11, 2024  
Trial Date: Not Set

1 I, Tylor Fowler, 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 employed by Defendant Supreme Fitness Group Cali Payroll, LLC  
7 (“Defendant”) as a salaried, non-exempt general manager in Los Angeles from approximately April  
8 13, 2022 to approximately March 24, 2024. During my employment with Defendant, I was subject  
9 to Defendant’s wage and hour policies and practices that are at issue in this case.

10 3. Specifically, I received incentive compensation, such as production incentives and  
11 bonuses, that were not properly factored into my overtime and meal period premium rates of pay  
12 and I sometimes could not take compliant meal and rest breaks because my breaks were interrupted  
13 by work-related duties and my staff and I was not paid premiums. As a result of the foregoing  
14 issues, I believe I received inaccurate wage statements and my paystubs were also very confusing,  
15 and I was not paid all wages when my employment with Defendant ended. I believe other non-  
16 exempt salaried employees of Defendant were subject to the same policies and procedures discussed  
17 above and that my claims against Defendant for unpaid wages and statutory and civil penalties are  
18 typical of Class Members’ claims.

19 4. I have been actively involved in this case since I first retained Justice for Workers,  
20 P.C. (“JFW”) in around July 2024. Without waiving the attorney-client privilege, prior to filing this  
21 lawsuit, my attorneys explained my role and responsibilities as a Class Representative, and I  
22 understand my responsibilities as a Class Representative. Since retaining my attorneys, I have had  
23 many discussions and meetings with the attorneys and staff at JFW, discussions regarding  
24 Defendant’s wage and hour practices and my claims in this case, litigation strategy, updates on how  
25 the case was proceeding, the Settlement, and how I could help the case and potential Class  
26 Members. I also gathered and reviewed documents for use in the lawsuit and reviewed relevant  
27 documents with my attorneys. I estimate that I have spent at least 20 hours on this case from the  
28 time I first spoke with my attorneys regarding this case until the present. I also understand that as

1 part of the Settlement, I have agreed to a general release of claims against Defendant, which is  
2 broader than the release of claims agreed to by other Class Members.

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

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

18 7. I understand that my attorneys will request that the Court approve a service award  
19 of \$10,000.00 for my efforts on behalf of the Class. I believe this amount is reasonable based on the  
20 amount of time and effort I have devoted to this case, the risks I have undertaken as a Class  
21 Representative including being sued by Defendant, and my general release of claims, as described  
22 above. My support for the Settlement is not contingent on my receiving this service award.

23 8. I do not have any conflict of interest with the proposed Administrator, Phoenix  
24 Settlement Administrators.

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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 July 10, 2026 at Northridge, California.  
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Tylor Fowler  
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