

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

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7 Attorneys for Plaintiffs EDUARDO JOSE PAIZ
and SHOGHIG PILILIAN

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF LOS ANGELES**

12 EDUARDO JOSE PAIZ and SHOGHIG
13 PILILIAN, individuals and on behalf of all
others similarly situated;

14 Plaintiffs,

15 vs.

16 EMANATE HEALTH, a California non-profit
17 corporation; and DOES 1 through 50,

18 Defendants.

Case No.: 24STCV21209

[Assigned for All Purposes to:
Hon. Laura A. Seigle, Dept. 17]

**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: May 6, 2026

TIME: 9:00 a.m.

DEPT: 17

Action Filed: August 20, 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 Plaintiffs in this action. I am one of the lawyers responsible for
5 representing 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 follows: I received my J.D., *cum laude*, along with my
8 Master of Dispute Resolution, from the Pepperdine University Rick J. Caruso School of Law in
9 2020. I was named to the Dean's Honor List in 2019. During law school, I served as the Student
10 Articles Editor of the Pepperdine Dispute Resolution Law Journal where I published the article:
11 *California: A New Golden Hub of International Commercial Arbitration?*, Pepperdine Dispute
12 Resolution Law Journal, Volume 20:2 (May 2020). I also served as the President of the Asian
13 Pacific American Law Student Association. I received two CALI Excellence for the Future Awards
14 for obtaining the highest grade in two law school courses. I also served as a summer law clerk for
15 the Orange County Public Defender's office and for the Law Office of Paul J. Barba, wherein I
16 defended an employer from employment claims brought by the U.S. Equal Employment
17 Opportunity Commission. I also served as a summer law clerk for the Beverly Hills office of
18 Arendsen Cane Molnar LLP and later became a litigation associate after passing the California Bar
19 in January 2021, wherein I served as second-chair trial counsel representing an employee in a wage
20 and hour dispute and represented an employer in a California Private Attorneys General Act
21 ("PAGA") action.

22 3. I practiced as a labor and employment associate for the next 3 years representing
23 employers in wage and hour class and/or PAGA actions, including at Lewis Brisbois Bisgaard &
24 Smith LLP and Fisher & Phillips LLP.

25 4. In January 2024, I joined Justice for Workers, P.C. ("JFW") and as an associate in
26 the Complex Litigation Practice Group, where I focus my practice on representing employees in
27 wage and hour class and PAGA action lawsuits.

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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 the lead plaintiff's counsel on over 100
12 pending class and/or PAGA actions. In addition to this matter, I have resolved over 50 other class
13 and/or PAGA actions at mediation. The following are cases in which I have received final approval
14 of class action and/or PAGA settlement and I was appointed as class and/or PAGA counsel: *Cesar*
15 *Tate v. St. Distributing Co., LLC*, Los Angeles Superior Court Case No. 23STCV22743, final
16 approval of class/PAGA settlement granted on February 11, 2026; *Andrew Carmona v. Western*
17 *Holdings Group dba Los Angeles Property Management Group*, Los Angeles Superior Court, Case
18 No. 23STCV24028, final approval of class/PAGA settlement granted on January 29, 2026; *Poul*
19 *Bedri v. City of Hope National Medical Center*, Los Angeles Superior Court, Case No.
20 23STCV23713, final approval of class/PAGA settlement granted on January 28, 2026; *Irene*
21 *Eunhee Ikuta v. TAKEE International, Inc.*, Los Angeles Superior Court, Case No. 23STCV21120,
22 final approval of class/PAGA settlement granted on January 22, 2026; *Amourafina Burton v. Trove*
23 *Recommerce, Inc.*, San Mateo Superior Court, Case No. 23-CIV-06108, final approval of
24 class/PAGA settlement granted on January 9, 2026; *Shayne Werber v. Teleferic Barcelona*, Los
25 Angeles Superior Court Case No. 23STCV25517, final approval of class/PAGA settlement granted
26 on December 17, 2025; *Linda Salazar Ayala v. Applied Membranes, Inc.*, San Diego Superior Court
27 Case No. 37-2023-00054420-CU-OE-CTL, final approval of class/PAGA settlement granted on
28 December 5, 2025; *Hai Luu v. Cambro Manufacturing Co.*, Orange County Superior Court, Case

1 No. 30-2024-01389852-CU-OE-CXC, approval of PAGA settlement granted on November 7, 2025;
2 *Justin Le, et al. v. Dragonfly Tea Bar LLC, et al.*, Los Angeles Superior Court Case No.
3 23STCV26247, final approval of class/PAGA settlement granted on October 29 2025; *Ryan*
4 *Lukman v. Safe Haven Security Services, LLC*, Riverside County Superior Court, Case No.
5 CVRI2400777, final approval of class/PAGA settlement granted on October 1, 2025; *Amaya Nelson*
6 *v. Clair Global Corp.*, Los Angeles Superior Court, Case No. 24STCV14597, final approval of
7 class/PAGA settlement granted on May 22, 2025; *Jose Regalado v. United Markets*, Marin County
8 Superior Court Case No. CV0001169, final approval of class/PAGA settlement granted on August
9 29, 2025; *Mushfiqur Chowdhury v. CWT US, LLC*, Los Angeles Superior Court Case No.
10 23STCV25373, final approval of class/PAGA settlement granted on August 22, 2025; *Pedro*
11 *Hernandez v. Edmund A. Gray Co.*, Los Angeles Superior Court Case No. 24STCV04118, final
12 approval of class/PAGA settlement granted on August 19, 2025; *Pedro Hernandez v. Steps Apparel*
13 *Group, Inc., et al.*, Los Angeles Superior Court Case No. 23STCV27883, approval of PAGA
14 settlement granted on August 13, 2025; *Doelisha Kelly v. Pan American Properties, Inc.*, Orange
15 County Superior Court Case No. 30-2023-01362739-CU-OE-CXC, approval of PAGA settlement
16 granted on July 11, 2025; *Alexis Bartram v. Lakeshore Learning Materials, LLC*, Los Angeles
17 Superior Court Case No. 23STCV21174, final approval of class/PAGA settlement granted on July
18 3, 2025; *Randall Bachman v. Geodis Logistics LLC*, Riverside Superior Court, Case No.
19 CVRI2400956, final approval of class/PAGA settlement granted on June 25, 2025; *Chinyere*
20 *Ezekwesili v. Vermont HealthCare Center LLC*, Los Angeles Superior Court Case No.
21 24STCV17871, approval of PAGA settlement granted on June 11, 2025; *Jorge Nieto v. Pick-Your-*
22 *Part Auto Wrecking*, Riverside Superior Court Case No. CVRI2402255, approval of PAGA
23 settlement granted on May 29, 2025; *Ted Kim v. Hyundai America Technical Center, Inc.*, San
24 Bernardino Superior Court Case No. CIVSB2326861, approval of PAGA settlement granted on
25 May 21, 2025; *Eric Echeverria v. Fireclay Tile Inc.*, San Benito Superior Court Case No. CU-23-
26 00249, final approval of class/PAGA settlement granted on May 7, 2025; *Isaias Velasco v. Nature's*
27 *Produce*, Los Angeles County Superior Court Case No. 23STCV23811, approval of PAGA
28 settlement granted on April 29, 2025; *Norma Borquez v. Smart Metals Recycling LLC*, Yolo

1 Superior Court Case No. CV2024-0050, final approval of class/PAGA settlement granted on April
2 4, 2025; *Juan Hinojos Campos v. Applied Technology Group, Inc.*, Kern Superior Court Case No.
3 BCV-23-103067, final approval of class/PAGA settlement granted on March 11, 2025; *Dennisha*
4 *Lampkin v. Sunstates Security, Inc.*, Riverside Superior Court Case No. CVRI2305600, final
5 approval of class/PAGA settlement granted on December 18, 2024.

6 7. As counsel for Plaintiff and the proposed Class, I have been intimately involved in
7 every aspect of this case. There is no conflict between my interests and the interests of the Class that
8 I am seeking to represent. I have demonstrated my ability to advocate for the interests of the Class
9 by initiating this litigation, undertaking extensive class discovery, negotiating the proposed
10 Settlement at mediation, seeking preliminary approval, and otherwise litigating this case. I also do
11 not have any conflict of interest with the Administrator.

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

14 Executed on March 19, 2026 at Los Angeles, California.

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Tiffany L. Luu