

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

9575 Bolsa Avenue

5 Westminster, CA 92683

Tel: 323-922-2000

6 Fax: 323-922-2000

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, 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 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. from the Pepperdine University
8 Rick J. Caruso School of Law in 2021. During law school, I served as the Literary Citation Editor
9 of the Pepperdine Law Review.

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

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

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

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

22 7. There is no conflict between my interests and the interests of the Class that I am
23 seeking to represent.

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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 March 19, 2026 at Los Angeles, California.

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Joseph C. Ramli