

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 Ave
5 Westminster, CA 92683
Tel: 323-922-2000
6 Fax: 323-922-2000

7 Attorneys for Plaintiff CRISTINA INZUNZA

8
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES**
11

12 CRISTINA INZUNZA, an individual and on
behalf of all others similarly situated;

13 Plaintiff,

14 vs.

15 EOS HOSPITALITY DBA L'ERMITAGE
16 BEVERLY HILLS, and DOES 1 through 50,

17 Defendants.
18
19
20
21
22
23
24
25
26
27
28

Case No.: 24STCV30593

[Assigned for All Purposes to:
Hon. Carolyn B. Kuhl, Dept. 12]

**DECLARATION OF CRISTINA
INZUNZA IN SUPPORT OF MOTION
FOR APPROVAL OF PAGA
SETTLEMENT**

[Filed concurrently with Motion for Approval
of PAGA Settlement; Supporting
Declarations; and (Proposed) Order]

DATE: March 23, 2026
TIME: 1:45 p.m.
DEPT: 12

Action Filed: November 19, 2024
Trial Date: Not Set

1 I, Cristina Inzunza, 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 EOS Hospitality L'Ermitage Employee LLC
7 ("Defendant") as a non-exempt employee from approximately December 2021 to approximately
8 July 24, 2024 as a housekeeper. During my employment with Defendant, I was subject to
9 Defendant's wage and hour policies and practices that are at issue in this case.

10 3. During my employment with Defendant, I was subjected to Defendant's policies,
11 procedures, and practices at issue in this case. I sometimes waited in line for several minutes to
12 clock in and out because there were around 10 people in line ahead of me. Occasionally, I was
13 unable to take my meal breaks off duty because my supervisor would talk to me about work when I
14 was on meal breaks or I had to take my meal breaks after the fifth hour of work because I was busy.
15 Occasionally, I was not able to take my rest breaks because I was really busy with work. I also
16 received incentive pay which I believe was not added to my overtime and paid sick leave rates of
17 pay. I also used my personal cellphone to text pictures of rooms I cleaned to my supervisor for
18 which I was not reimbursed. As a result of these issues, I believe I was not paid all wages upon
19 termination of employment and I did not receive accurate wage statements.

20 4. I have been actively involved in this case since I first retained Justice for Workers,
21 P.C. ("JFW") in November 2024. Without waiving the attorney-client privilege, prior to filing this
22 lawsuit, my attorneys explained my role and responsibilities as a PAGA representative, and I
23 understand my responsibilities as a PAGA representative. Since retaining my attorneys, I have had
24 many discussions with the attorneys and staff at JFW, discussions regarding Defendant's wage and
25 hour practices and my claims in this case, potential witnesses, litigation strategy, updates on how
26 the case was proceeding, the Settlement, and how I could help the case and other employees of
27 Defendant. I also gathered and reviewed documents for use in the lawsuit and reviewed relevant
28 documents with my attorneys. I estimate that I have spent at least 20 hours on this case from the

1 time I first spoke with my attorneys regarding this case until the present.

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

9 6. I understood that at the time I filed this action, as a PAGA representative, I owed a
10 duty to the aggrieved employees 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 PAGA 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 \$5,000.00 for my service to the State and aggrieved employee. I believe this amount is
20 reasonable based on the amount of time and effort I have devoted to this case, the risks I have
21 undertaken as a PAGA representative. My support for the Settlement is not contingent on my
22 receiving this service award.

23 ///

24 ///

25 ///

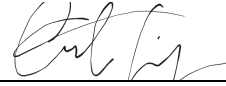
26 ///

27 ///

28 ///

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 December 3, 2025 at Los Angeles, California.
4

5 

6 _____
Cristina Inzunza
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28