

ZAKAY LAW GROUP, APLC

Shani O. Zakay (State Bar #277924)

shani@zakaylaw.com

Jackland K Hom (State Bar #327243)

jackland@zakaylaw.com

Nicole Noursamadi (State Bar #357246)

nicole@zakaylaw.com

Jaclyn Joyce (State Bar #285124)

jaclyn@zakaylaw.com

5440 Morehouse Drive, Suite 3600

San Diego, CA 92121

Telephone: (619) 255-9047

JCL LAW FIRM, APC

Jean-Claude Lapuyade (State Bar #248676)

jlapuyade@jcl-lawfirm.com

5440 Morehouse Drive, Suite 3600

San Diego, CA 92121

Telephone: (619) 599-8292

Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ORANGE

STEPHANIE IMMINGS, an individual, on behalf
of herself, and on behalf of all persons similarly
situated,

Plaintiff,

v.

GREAT SUBS SC II, LLC, a California limited
liability company; H & H WEST, LLC, a
California limited liability company; GREAT
SUBS, LLC, a California limited liability
company; GREAT SUBS SC I, LLC, a California
limited liability company; GREAT SUBS SC IV,
LLC, a California limited liability company;
GREAT SUBS SC III, LLC, a California limited
liability company; J & H WEST, LLC, a
California limited liability company; GREAT
SUBS SOUTHERN CALIFORNIA, LLC, a
California limited liability company; GREAT
SUBS SC V, LLC, a California limited liability
company; and DOES 1-50, Inclusive,

Defendants.

Case No. 30-2024-01408266-CU-OE-CXC

**DECLARATION OF STEPHANIE
IMMINGS IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS SETTLEMENT**

Date: April 13, 2026

Time: 1:30 p.m.

Reservation No. 74760709

Judge: Hon. David A. Hoffer
Dept.: CX103

1 I, STEPHANIE IMMINGS, declare as follows:

2 1. I am over the age of eighteen, and the Plaintiff and Proposed Class Representative
3 in the above-entitled matter. I submit this declaration in support of Plaintiff's Motion for
4 Preliminary Approval of Class Action and PAGA Settlement and in support of my application for
5 the requested Service Award. I have personal knowledge of all the facts stated herein. I could and
6 would competently testify under oath to these facts in court if requested to do so.

7 2. On June 20, 2024, I filed a class action lawsuit in the Orange County Superior Court.
8 My case was filed on behalf of myself all employees who are or previously were employed by
9 Defendants Great Subs SC II, LLC, and/or H & H West, LLC, and/or Great Subs, LLC, and/or
10 Great Subs SC IV, LLC, and/or Great Subs SC III, LLC, and/or J & H West, LLC, and/or Great
11 Subs Southern California, LLC, and/or Great Subs SC V, LLC, ("Defendants") in California and
12 who were classified as non-exempt employees during the Class Period. The Class Period means
13 the period between June 20, 2020, to July 30, 2025. I worked for Defendants from June 2019
14 through June 2023 in California.

15 3. I believe that I am, have been and will continue to represent the interests of the class
16 I am seeking to represent fairly and adequately. Further, I believe that I have claims that are typical
17 of the claims of the Class Members that I am seeking to represent. Specifically, like the Class I
18 am seeking to represent, I was employed by Defendants as a non-exempt employee during the
19 Class Period. Consequently, I am a member of the Class that I am seeking to represent.

20 4. Additionally, my claims are typical of the claims of the Class Members that I am
21 seeking to represent because I was subject to the same alleged unlawful employment policies and
22 practices at issue in this action, including but not limited to, Defendants' failure to pay for all hours
23 worked, failure to provide compliant meal and rest periods, failure to provide accurate itemized
24 wage statements, and failure to pay all wages due at the time of their separation. Factually,
25 Defendants' policies and practices apply class wide, and Defendants' liability can be determined
26 by facts common to all Class Members.

27 5. Further, there is no conflict between my interests and the interests of the class that I
28 am seeking to represent. My interests are entirely coextensive with the interests of the Class

1 Members. I was injured by the same company-wide practices to which the proposed Class was
2 subject and I seek the same relief. I have already demonstrated my ability to advocate for the
3 interests of the Class Members by initiating this litigation, providing documents to Class Counsel,
4 participating in the investigation and negotiations in the Action, and evaluating the proposed
5 settlement to assure that it is fair.

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

15 7. I believe that the proposed settlement before the Court is fair, reasonable, and
16 adequate, and made in the best interest of the Class Members. Consequently, I respectfully, and
17 humbly, ask the Court to grant preliminary approval of the Settlement and all of its terms.

18 I declare under penalty of perjury under the laws of the State of California that the foregoing
19 is true and correct. Executed on 01/26/2026 (date), at Tustin (city), California.

20
21
22 By:  Stephanie imming (Jan 26, 2026 13:17:57 PST)
23 STEPHANIE IMMINGS
24
25
26
27
28