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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF CONTRA COSTA

ZHI H. HUANG, an individual, in his
representative capacity on behalf of the State of
California and fellow Aggrieved Employees,

Plaintiff,

v.

HUTCHINSON MOTORS, INC., a California
corporation; MICHAEL C. STEAD, INC., a
California corporation; MICHAEL STEAD'S
AUTO DEPOT, INC., a California
corporation; and DOES 1-50, Inclusive,

Defendants.

Case No.: C23-01698

[Assigned for all purposes to the Hon. Edward
G Weil in Dept.]

**DECLARATION OF PLAINTIFF ZHI H.
HUANG FOR APPROVAL OF
REPRESENTATIVE SETTLEMENT**

Date:

Time:

Judge: Hon. Edward G Weil

Dept: 39

DECLARATION OF ZHI H. HUANG

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2 1. I am a party to this action and reside in the State of California. I am fully competent
3 to make this declaration. I have personal knowledge of the facts set forth herein, except for those
4 stated on information and belief, and as to those I am informed and believe them to be true. If called
5 upon to testify, I could and would testify as set forth herein.

6 2. I make this Declaration in support of Plaintiff's Motion to Approve PAGA
7 Settlement.

8 3. I was employed by Defendant Hutchinson Motors, Inc. ("Defendant"), from
9 November of 2021 to March of 2023, paid in part omission-based compensation and in part an
10 hourly wage and non-discretionary bonuses. During my employment, I was entitled to minimum
11 wages, overtime pay, and legally compliant meal and rest periods.

12 4. During my employment with Defendant, I took meal periods that were after the fifth
13 hour, short, or not duty-free. I witnessed other employees with my job duties often taking meal
14 periods that were after the fifth hour, short, or not duty-free, as well.

15 5. I do not believe I was provided with opportunities to take full, uninterrupted 10-
16 minute rest periods while working with Defendant and am informed and believe my coworkers were
17 not provided with such an opportunity, either.

18 6. Before and during the course of litigation, I was actively involved in assisting my
19 attorneys to support the PAGA claims asserted. My involvement began before the initial complaint
20 was filed wherein, I provided first-hand knowledge and documentation as to Defendant's practices,
21 its ownership and corporate structure, and its wage and hour policies and practices.

22 7. Part of the information I relayed was with regard to Defendant's timekeeping policies
23 and practices, and their meal and rest period policies and practices.

24 8. I provided my attorneys with documents provided to me by Defendant during my
25 employment.

26 9. I assisted in reviewing time and payroll records with my attorneys and informed them
27 of Defendant's employment policies and whether those policies matched Defendant's practices.

1 10. My attorneys called me to ask me questions over several times throughout the
2 litigation and I contacted my attorneys several times to stay updated on the case and offer my
3 assistance on any matters I could be helpful with. I also worked with my attorneys over the next
4 several months after the case settled to understand and execute a long form settlement agreement.

5 11. Over the past few months since the case settled, I have stayed in touch with my
6 attorneys to ensure that there was no undue delay in payment for other aggrieved employees for
7 whom I brought this Action.

8 12. I believe that, through the present, I have spent at least 10-15 hours in connection
9 with this matter, which included time spent having preliminary calls with my attorneys; doing an
10 intake with my attorneys; time spent searching for documents relating to my employment; time
11 spent reading and understanding the Settlement Agreement; time spent answering calls to discuss
12 Defendant's timekeeping, pay, meal and rest periods, and to review time and payroll records; time
13 spent discussing with my attorneys on Defendant's policies and practices; and time spent checking
14 in on the status of the case, among other things. I also spent time preparing this declaration to support
15 Plaintiff's Motion to Approve PAGA Settlement.

16 16. I feel that by bringing this lawsuit, I could stand up for not only my rights but the
17 rights of other employees who suffered from the same unfair wage practices. I felt that current
18 employees might not want to share their experiences with Defendant since they feared losing their
19 jobs.

20 17. By bringing this lawsuit, I have put the interests of the Aggrieved Employees ahead
21 of my own.

22 19. I have also had to provide a general release of claims to Defendant as part of the
23 settlement. This includes a release of the claims I alleged against Defendant as part of the arbitration
24 I opened on or around December 28, 2023 with JAMS, Reference No. 5120000189. My general
25 release of my individual claims is outlined in a separate agreement. I will file this settlement
26 agreement under seal for the Court to review in camera, at the Court's request. My understanding,
27 in addition, is that if I brought this case individually, I may have earned more compensation
28

1 individually and on a much quicker timeline than the timeline to resolve this Action.

2 20. My goal in bringing this lawsuit was to obtain a recovery on behalf of the Aggrieved
3 Employees and, even more importantly, to put an end to what I believe are illegal practices on the
4 part of Defendant. I believe I have achieved both through this lawsuit and settlement.

5 21. I understand the obligations of adequately representing the Aggrieved Employees of
6 Defendant.

7 22. I understand the substantial burden I will have to undertake in order to represent the
8 Aggrieved Employees of Defendant.

9
10 I declare under penalty of perjury under the laws of the State of California that the foregoing
11 is true and correct this 10th day of December 2025, at PALO ALTO (City),
12 California.

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vin huang (Dec 10, 2025 15:34:19 PST)

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ZHI H. HUANG