

JCL LAW FIRM, APC

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Attorneys for Plaintiff AMANDA M. PATTERSON

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF RIVERSIDE

Coordination Proceeding
Special Title (Rule 3.550)

RCSH WAGE AND HOUR CASES

Included Actions:

Eddie Castillo, et al. v. RCSH Operations, Inc., et al., San Francisco County Superior Court Case No. CGC-21-594237

Eddie Castillo v. RCSH Operations, Inc., et al., Los Angeles County Superior Court Case No. 21SMCV01530

Adrian Quiroz Guerrero, et al. v. Ruth's Hospitality Group, Inc., Riverside County Superior Court Case No. RIC1804127

Amanda M. Patterson v. RCSH Operations, Inc., Contra Costa County Superior Court Case No. MSC21-02077

Case No.: JCCP5243

Honorable Harold W. Hopp
Department 10

CLASS ACTION

**SUPPLEMENTAL DECLARATION
OF JEAN-CLAUDE LAPUYADE,
ESQ. IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: August 17, 2023
Time: 8:30 a.m.
Department: 10

Castillo Complaint
Filed: July 29, 2021
Castillo PAGA
Complaint Filed: Sept. 17, 2021
Patterson Complaint
Filed: Oct. 20, 2021
Guerrero Complaint
Filed: Feb. 26, 2018
Trial Date: None Set

1 I, Jean-Claude Lapuyade, Esq., declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would
3 competently testify to the following facts from my own personal knowledge. I am an attorney-at-law
4 and the owner of the JCL LAW FIRM, APC (hereinafter "Class Counsel"). I am co-counsel for
5 Plaintiffs and putative class representatives, individually and on behalf of other members of the
6 general public similarly situated and on behalf of aggrieved employees pursuant to the Private
7 Attorneys General Act ("PAGA") (collectively, "Plaintiffs").

8 2. The Parties agreed to appoint Inland Counties Legal Services, Inc., as the Cy Pres. I
9 do not have any interest in, or relationship or connection with, the Inland Counties Legal Services,
10 Inc. Similarly, no attorney in my firm has such interest, relationship or connection. Finally, I have
11 conferred with my co-counsel and the Plaintiff and confirmed that neither have any connection to or
12 relationship with the Inland Counties Legal Services, Inc. Separate declarations from my co-counsel
13 and Plaintiff are submitted concurrently herewith.

14 3. Other than the included actions in this JCCP proceeding, I am not aware of any class,
15 representative or other collective action in any other court in this or any other jurisdiction that asserts
16 claims similar to those asserted in this action on behalf of a class or group of individuals some or all
17 of whom would also be members of the class defined in this action. I made a reasonable inquiry of
18 other members of the JCL Law Firm, APC, to determine whether those individuals are aware of any
19 such similar action. After a reasonable inquiry, to the best of their knowledge there is no such
20 similar action outside of this JCCP proceeding.

21 I declare under penalty of perjury under the laws of the State of California that the foregoing
22 is true and correct. Executed this 15th day of September 2023, at San Diego, California.

23
24 **JCL LAW FIRM, APC**

25 By: 
26 Jean-Claude Lapuyade
27 Attorneys for Plaintiffs
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