

1 **JUSTICE FOR WORKERS, P.C.**

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7 Attorneys for Plaintiff MARCOS BELTRAN

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF RIVERSIDE**

10  
11 MARCOS BELTRAN, an individual and on  
behalf of all others similarly situated;

12 Plaintiff,

13 vs.

14 FONDOMONTE CALIFORNIA, LLC, a  
15 Delaware limited liability company; and DOES  
1 through 50,

16 Defendants

Case No.: CVRI2402849

[Assigned for All Purposes to:  
Hon. Harold W. Hopp, Dept. 1]

**DECLARATION OF TIFFANY L. LUU IN  
SUPPORT OF MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION AND PAGA SETTLEMENT**

[Filed Concurrently with Motion for  
Preliminary of Approval of Class Action and  
PAGA Settlement, Notice of Filing Class  
Action and PAGA Settlement Agreement,  
Declarations in Support Thereof, and  
[Proposed] Order]

DATE: February 10, 2026

TIME: 8:30 a.m.

DEPT: 1

Reservation No.: 897260667678

Action Filed: May 24, 2024

Trial Date: Not Set

1 I, Tiffany L. Luu, 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 Plaintiff 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. I am one of the primary attorneys in this case. My qualifications are as follows: I  
8 received my J.D., *cum laude*, along with my Master of Dispute Resolution, from the Pepperdine  
9 University Rick J. Caruso School of Law in 2020. I was named to the Dean’s Honor List in 2019.  
10 During law school, I served as the Student Articles Editor of the Pepperdine Dispute Resolution  
11 Law Journal where I published the article: *California: A New Golden Hub of International*  
12 *Commercial Arbitration?*, Pepperdine Dispute Resolution Law Journal, Volume 20:2 (May 2020). I  
13 also served as the President of the Asian Pacific American Law Student Association. I received two  
14 CALI Excellence for the Future Awards for obtaining the highest grade in two law school courses.  
15 I also served as a summer law clerk for the Orange County Public Defender’s office and for the  
16 Law Office of Paul J. Barba, wherein I defended an employer from employment claims brought by  
17 the U.S. Equal Employment Opportunity Commission. I also served as a summer law clerk for the  
18 Beverly Hills office of Arendsen Cane Molnar LLP and later became a litigation associate after  
19 passing the California Bar in January 2021, wherein I served as second-chair trial counsel  
20 representing an employee in a wage and hour dispute and represented an employer in a California  
21 Private Attorneys General Act (“PAGA”) action.

22 3. I practiced as a labor and employment associate for the next 3 years representing  
23 employers in wage and hour class and/or PAGA actions, including at Lewis Brisbois Bisgaard &  
24 Smith LLP and Fisher & Phillips LLP.

25 4. In January 2024, I joined Justice for Workers, P.C. (“JFW”) and as an associate in  
26 the Complex Litigation Practice Group, where I focus my practice on representing employees in  
27 wage and hour class and PAGA action lawsuits.

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1           5.       My primary practice has been employment law throughout my entire private career.  
2 I have handled a number of wage and hour matters, including individual actions and class and/or  
3 PAGA actions, on behalf of plaintiffs and defendants. The following is a list of wage and hour  
4 class and/or PAGA actions where I served as defense counsel and in which final settlement  
5 approval was granted, the action was tried to verdict, or denial of motion for class certification was  
6 obtained: *Sylvia Martinez v. CCS Engineering Fresno, Inc., et al.*, Los Angeles Superior Court, No.  
7 22STCV14985, filed May 4, 2022 (PAGA settlement approved on May 13, 2023); *Quesada v.*  
8 *California Commerce Club, Inc.*, Los Angeles Superior Court, No. 19STCV41482, filed November  
9 18, 2019 (PAGA settlement approved on November 17, 2021); and *Alfonso Valadez v. California*  
10 *Commerce Club, Inc.*, Los Angeles Superior Court, No. BC644587, filed December 20, 2016  
11 (PAGA settlement approved on December 17, 2021).

12           6.       In my current practice at JFW, I serve as plaintiff's counsel on over 150 pending  
13 class and/or PAGA actions. In addition to this matter, I have resolved 28 other class and/or PAGA  
14 actions at mediation which are in varying stages of settlement approval or negotiating the long-form  
15 class and PAGA settlement agreement. The following are cases in which I have received  
16 preliminary approval of class action settlement and I was appointed as class counsel: *Ryan Lukman*  
17 *v. Safe Haven Security Services, LLC*, Riverside County Superior Court, Case NO. CVRI2400777,  
18 final approval of class/PAGA settlement granted on October 1, 2025; *Amaya Nelson v. Clair Global*  
19 *Corp.*, Los Angeles Superior Court, Case No. 24STCV14597, final approval of class/PAGA  
20 settlement granted on May 22, 2025; *Jose Regalado v. United Markets*, Marin County Superior  
21 Court Case No. CV0001169, final approval of class/PAGA settlement granted on August 29, 2025;  
22 *Irene Eunhee Ikuta v. TAKEE International, Inc.*, Los Angeles Superior Court, Case No.  
23 23STCV21120, preliminary approval of class/PAGA settlement granted on August 27, 2025;  
24 *Mushfiqur Chowdhury v. CWT US, LLC*, Los Angeles Superior Court Case No. 23STCV25373,  
25 final approval of class/PAGA settlement granted on August 22, 2025; *Pedro Hernandez v. Edmund*  
26 *A. Gray Co.*, Los Angeles Superior Court Case No. 24STCV04118, final approval of class/PAGA  
27 settlement granted on August 19, 2025; *Poul Bedri v. City of Hope National Medical Center*, Los  
28 Angeles Superior Court Case No. 23STCV23713, preliminary approval of class/PAGA settlement

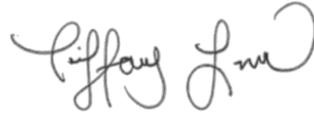
1 granted on August 19, 2025; *Linda Salazar Ayala v. Applied Membranes, Inc.*, San Diego Superior  
2 Court, Case No. 37-2023-00054420-CU-OE-CTL, preliminary approval of class/PAGA action  
3 settlement granted on August 15, 2025; *Shayne Alissa Werber v. Teleferic Barcelona LA LLC, et*  
4 *al.*, Los Angeles Superior Court Case No. 23STCV25517, preliminary approval of class/PAGA  
5 action settlement granted on August 14, 2025; *Pedro Hernandez v. Steps Apparel Group, Inc., et*  
6 *al.*, Los Angeles Superior Court Case No. 23STCV27883, approval of PAGA settlement granted on  
7 August 13, 2025; *Doelisha Kelly v. Pan American Properties, Inc.*, Orange County Superior Court  
8 Case No. 30-2023-01362739-CU-OE-CXC, approval of PAGA settlement granted on July 11,  
9 2025; *Alexis Bartram v. Lakeshore Learning Materials, LLC*, Los Angeles Superior Court Case No.  
10 23STCV21174, final approval of class/PAGA settlement granted on July 3, 2025; *Randall Bachman*  
11 *v. Geodis Logistics LLC*, Riverside Superior Court, Case No. CVRI2400956, final approval of  
12 class/PAGA settlement granted on June 25, 2025; *Chinyere Ezekwesili v. Vermont HealthCare*  
13 *Center LLC*, Los Angeles Superior Court Case No. 24STCV17871, approval of PAGA settlement  
14 granted on June 11, 2025; *Jorge Nieto v. Pick-Your-Part Auto Wrecking*, Riverside Superior Court  
15 Case No. CVRI2402255, approval of PAGA settlement granted on May 29, 2025; *Ted Kim v.*  
16 *Hyundai America Technical Center, Inc.*, San Bernardino Superior Court Case No. CIVSB2326861,  
17 approval of PAGA settlement granted on May 21, 2025; *Eric Echeverria v. Fireclay Tile Inc.*, San  
18 Benito Superior Court Case No. CU-23-00249, final approval of class/PAGA settlement granted on  
19 May 7, 2025; *Isaias Velasco v. Nature's Produce*, Los Angeles County Superior Court Case No.  
20 23STCV23811, approval of PAGA settlement granted on April 29, 2025; *Norma Borquez v. Smart*  
21 *Metals Recycling LLC*, Yolo Superior Court Case No. CV2024-0050, final approval of class/PAGA  
22 settlement granted on April 4, 2025; *Juan Hinojos Campos v. Applied Technology Group, Inc.*,  
23 Kern Superior Court Case No. BCV-23-103067, final approval of class/PAGA settlement granted  
24 on March 11, 2025; *Dennisha Lampkin v. Sunstates Security, Inc.*, Riverside Superior Court Case  
25 No. CVRI2305600, final approval of class/PAGA settlement granted on December 18, 2024.

26 7. From the inception of the case, my team and I have zealously represented the  
27 interests of Plaintiff and the Class Members. The Settlement was obtained for the benefit of the  
28 Class, as opposed to the individual Plaintiff. Based on my review of all the information, and based

1 on my experience in wage and hour litigation, I believe this settlement to be fair, adequate, and  
2 reasonable.

3 I declare, under penalty of perjury under the laws of the State of California, that the  
4 foregoing is true and correct.

5 Executed on October 29, 2025 at Los Angeles, California.

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Tiffany L. Luu

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