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14 Attorneys for Plaintiff Marcos Castro

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **FOR THE COUNTY OF BUTTE**

17 ROBERT LAWSON, on behalf of himself
18 and all "aggrieved employees" pursuant to
19 Labor Code § 2698 *et seq.*,

20 Plaintiff,

21 v.

22 GRAPHIC PACKAGING
23 INTERNATIONAL, LLC, a Delaware
24 limited liability company, and DOES 1
25 through 10, inclusive,

26 Defendants.

CASE NO: 20CV01921

*Assigned to the Honorable Stephen E. Benson,
Dept. 6*

CLASS ACTION

**DECLARATION OF MAI TULYATHAN IN
SUPPORT OF RENEWED UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

DATE: June 8, 2022

TIME: 9:00 a.m.

DEPT.: 6

Action Filed: September 29, 2020

1 I, MAI TULYATHAN, hereby declare and state as follows:

2 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
3 California, and am with the law firm Diversity Law Group, counsel of record for Named Plaintiff
4 Marcos Castro ("Plaintiff Castro"). I have personal knowledge of the facts set forth below and if
5 called to testify I could and would do so competently.

6 2. From the inception of the case, counsel for Plaintiffs have zealously represented
7 the interests of the putative class. The settlement was obtained for the benefit of the putative
8 class, as opposed to the individual plaintiffs.

9 3. I strongly believe that Plaintiffs can prevail at trial. However, I also believe in the
10 fairness of the settlement, which is based on factoring in the inherent risks in drawn-out
11 litigation and the specific risks that a class might not be certified and/or that Plaintiffs could fail
12 to establish liability, as well as the possibility of appeals.

13 4. After taking into account sharply disputed factual and legal issues involved in this
14 litigation, the risks attending further prosecution, and the substantial benefits to be received
15 pursuant to the compromise and settlement of the litigation, I have concluded that settlement on
16 the terms set forth in the Settlement Agreement is appropriate and in the best interests of
17 Plaintiffs and the putative class.

18 5. Plaintiffs' counsel have been approved as class counsel in a number of wage and
19 hour class actions and have extensive litigation experience.

20 6. I am one of the primary attorneys on this matter. My qualifications are as follows:
21 I received my JD from Loyola Law School in 2017. I received the First Honors Award in Legal
22 Research and Writing, First Honors Award in Appellate Advocacy, and First Honors Award in
23 Civil Litigation Practicum I for achieving the highest grade in those classes. During law school, I
24 was a Staff Editor for Loyola Law Review. I was also an extern at the U.S. District Court, Central
25 District of California, for the Honorable Christina A. Snyder, and a certified law clerk at the San
26 Diego County District Attorney's Office, Collaborative Courts Division, and the Los Angeles
27 County District Attorney's Office, Consumer Protection and Environmental Crimes Division. In
28 2016, I participated in Loyola Law School's Scott Moot Court Competition, where I placed Top

1 16 and was the awarded the Top Ten Brief Award. In 2017, I participated in the Employment
2 Rights Clinic, an extension of the Division of Labor Standards Enforcement created to investigate
3 retaliation complaints. Upon graduation from law school, I was admitted to the California Bar in
4 December 2017.

5 7. I am currently an associate at the law firm Diversity Law Group, P.C., an
6 employment law firm that has handled numerous wage and hour class and individual actions, on
7 both plaintiff and defense sides. The firm currently has cases in numerous state courts, including
8 the Santa Clara Superior Court, Los Angeles Superior Court, Orange County Superior Court, San
9 Diego County Superior Court, Monterey County Superior Court, as well as the United States
10 District Courts for the Central, Northern, Southern, and Eastern Districts of California.

11 8. I am currently handling and/or have handled numerous wage and hour class action
12 and PAGA lawsuits, including *Magadia v. Wal-Mart Associates, Inc., et al.* (Case Number 5:17-
13 cv-00062-LHK); *Garcia v. Wal-Mart Associates, Inc., et al.* (Case Number 3:18-cv-00500-L-
14 MDD); *Hernandez v. Wells Fargo Bank, N.A.* (Case Number 16CV299319); *Lao v. H & M*
15 *Hennes & Mauritz, L.P.* (Case Number 5:16-cv-333 EJD); *Arroyo v. Int'l Paper Company* (Case
16 Number 5:17-cv-06211-BLF); *Baker v. California Forensic Medical Group, Inc., et al.*, Judicial
17 Council Coordination Proceeding No. 4999 (Lead Case No. 17CV003723); and *Garcia v. Apex*
18 *Systems, LLC, et al.* (Case Number RG19014709).

19 9. In 2018, I argued before the California Court of Appeal, Second Appellate District,
20 in the case of *Lee v. California Commerce Club, Inc.* (California Court of Appeal Case Number
21 B276171, LASC Case Number BC596924), and *Perez v. Standard Drywall, Inc.* (California
22 Court of Appeal Case Number A146819, Alameda Sup. Ct. No. RG15761142). In that same year,
23 I also assisted the firm in successfully obtaining class certification and partial summary judgment
24 by the United States District Court, Central District of California in the case of *Magadia v. Wal-*
25 *Mart Associates, Inc.* (Case Number 17-CV-00062-LHK). I third chaired the bench trial in that
26 same case in December 2018.

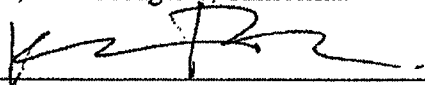
27 10. I have also been certified as part of the Court's order granting class certification
28 and/or approved as class counsel for class and PAGA settlements in numerous other wage/hour

1 class actions. Most recently, I was certified and/or approved as class counsel in the cases *Sims v.*
2 *QG Printing II LLC et al* (CACD Case No.: 5:20-cv-01632-DMG-KK), *Garcia v. Wal-Mart*
3 *Associates, Inc., et al.* (CASD Case Number 3:18-cv-00500-L-MDD), *Richert v. Samaritan, LLC,*
4 *et al.* (Santa Clara County Superior Court, Case Number 17CV314186), *Song v. THC – Orange*
5 *County, Inc.* (CACD Case No. 8-17-cv-965-JLS (DFM)), and *Hernandez v. Wells Fargo Bank*
6 *National Ass'n, et al* (Santa Clara Superior Court, Case No. 16-CV-299319). Moreover, I was
7 granted final approval as class counsel in *California Forensic Medical Group Wage and Hour*
8 *Cases* (Monterey County Superior Court, Case No. JCCP4999), *Valles v. Community Hospital of*
9 *the Monterey Peninsula* (Monterey County Superior Court, Case No. 17CV003452), *Chavez v.*
10 *Hugo Boss Retail, Inc.* (Santa Clara County Superior Court, Case No. 18CV322644), *Hernandez*
11 *v. Wells Fargo Bank National Ass'n, et al* (Santa Clara County Superior Court, Case No. 16-CV-
12 299319), *Mendez v. Falcon Trading Company* (Monterey County Superior Court, Case No.
13 19CV004512), and *Truong v. DS Services of America, Inc.* (Solano County Superior Court, Case
14 No. FCS054399). I acted as lead counsel in these cases listed above.

15 11. My co-counsel and I will adequately represent the Class Members in this action.
16 Plaintiffs' Counsel have and will zealously represent Plaintiffs and the Class and pursue this
17 lawsuit to its conclusion. I have no conflicts with the Class and will adequately represent the
18 Class.

19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct.

21 Executed on this 3rd day of May 2022, at Los Angeles, California.

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23 Mai Tulyathan

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