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Attorneys for Plaintiff,
EDWARD GNAT, on behalf of himself and all similarly aggrieved employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF MONTEREY

EDWARD GNAT, on behalf of himself and
all similarly aggrieved employees,

Plaintiff,

v.

QUINN COMPANY; and DOES 1 through
50, inclusive,

Defendants.

Case No. 20CV003431

**DECLARATION OF MAI TULYATHAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: July 12, 2024
Time: 8:30 a.m.
Dept.: 15

Action Filed: December 21, 2020
Trial Date: Not Set

1 **DECLARATION OF KWANPORN “MAI” TULYATHAN**

2 I, Kwanporn “Mai” Tulyathan, declare as follows:

3 1. I am an attorney at law, duly admitted to practice before all courts in the State of
4 California, and am a member of the law firm of the Diversity Law Group, P.C., counsel of
5 record for Plaintiff Edward Gnat (“Plaintiff”). I have personal knowledge of the facts set forth
6 below and if called to testify I could and would do so competently.

7 2. The proposed settlement meets the criteria for this Court to grant final approval
8 of this matter on a class-wide basis as the settlement is fair, adequate, and reasonable. The
9 settlement was achieved after Plaintiff engaged in significant discovery and litigation, and
10 after mediation with the Honorable Steven Denton (Ret.).

11 3. Based on Class Counsel’s independent investigations and evaluations, I am of
12 the opinion that settlement is fair, reasonable, and adequate and is in the best interests of the
13 Settlement Class and Defendant in light of all known facts and circumstances and the expenses
14 and risks inherent in litigation. This settlement should be granted final approval.

15 4. I have been approved as class counsel in numerous other wage/hour class actions
16 that have been granted class certification and final approval.

17 5. My qualifications are as follows: I received my J.D. from Loyola Law School in
18 2017. I received the First Honors Award in Legal Research and Writing, First Honors Award
19 in Appellate Advocacy, and First Honors Award in Civil Litigation Practicum I for achieving
20 the highest grade in those classes. During law school, I was a Staff Editor for Loyola Law
21 Review. I was also an extern at the U.S. District Court, Central District of California, for the
22 Honorable Christina A. Snyder, and a certified law clerk at the San Diego County District
23 Attorney’s Office, Collaborative Courts Division, and the Los Angeles County District
24 Attorney’s Office, Consumer Protection and Environmental Crimes Division. In 2016, I
25 participated in Loyola Law School’s Scott Moot Court Competition, where I placed Top 16
26 and was awarded the Top Ten Brief Award. In 2017, I participated in the Employment
27 Rights Clinic, an extension of the Division of Labor Standards Enforcement created to
28 investigate retaliation complaints. Upon graduation from law school, I was admitted to the

1 California Bar in December 2017.

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

9 7. I am currently handling and/or have handled numerous wage and hour class
10 action and PAGA lawsuits.

11 8. In 2018, I argued before the California Court of Appeal, Second Appellate
12 District, in the case of *Lee v. California Commerce Club, Inc.* (California Court of Appeal
13 Case Number B276171, LASC Case Number BC596924), and *Perez v. Standard Drywall, Inc.*
14 (California Court of Appeal Case Number A146819, Alameda Sup. Ct. No. RG15761142). In
15 that same year, I also assisted the firm in successfully obtaining class certification and partial
16 summary judgment by the United States District Court, Northern District of California in the
17 case of *Magadia v. Wal-Mart Associates, Inc.* (Case Number 17-CV-00062-LHK). I third
18 chaired the bench trial in that same case in December 2018.

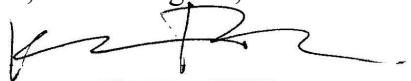
19 9. I have also been certified and/or approved as class counsel in numerous other
20 wage/hour class actions. Most recently, I was certified as class counsel in the cases *Garcia v.*
21 *Wal-Mart Associates, Inc., et al.* (S.D. Cal., Case Number 3:18-cv-00500-L-MDD), *Richert v.*
22 *Samaritan, LLC, et al.* (Santa Clara County Superior Court, Case Number 17CV314186), *Song*
23 *v. THC – Orange County, Inc.* (C.D. Cal., Case No. 8-17-cv-965-JLS (DFM)), *Hernandez v.*
24 *Wells Fargo Bank National Ass’n, et al* (Santa Clara County Superior Court, Case No. 16-CV-
25 299319), and *Sims v. QG Printing II, LLC, et al.* (C.D. Cal., Case No. ED CV 20-1632-DMG
26 (KKx)), as part of the courts’ orders granting class certification pursuant to Fed. R. Civ. P. 23
27 and California Code of Civil Procedure § 382.

28 10. Moreover, I was granted final approval as class counsel in *Lao v. H & M Hennes*

1 & Mauritz, L.P. (N.D. Cal., Case No. 5:16:cv-333 EJD), *Abarca v. El Estero Car Wash, Inc. et*
2 *al* (Monterey County Superior Court, Case No. 18CV003398), *Valles v. Community Hospital*
3 *of the Monterey Peninsula* (Monterey County Superior Court, Case No. 17CV003452),
4 *Hernandez v. Wells Fargo Bank National Ass’n, et al* (C.D. Cal., Case No. 16-CV-299319);
5 *Baker v. California Forensic Medical Group, Inc., et al.*, Judicial Council Coordination
6 Proceeding No. 4999 (Lead Case No. 17CV003723); *Mendez v. Falcon Trading Company*
7 (Monterey County Superior Court, Case No. 19CV004512).

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

10 Executed on this 18th day of June 2024, at Los Angeles, California.

11 
12 Kwanporn “Mai” Tulyathan