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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF YOLO

JENICA COLE, SHAUNA ADAMS,
KASSANDRA MENDIVIL, RICHARD
BAUTISTA, MICHAEL NEVAREZ, JOE
NUNEZ, and HUNTER MEELEE, on behalf
of themselves and all others similarly situated,
and as “aggrieved employees” on behalf of
other “aggrieved employees” under the Labor
Code Private Attorneys General Act of 2004,

Plaintiffs,

vs.

STRATEGIC GREEN PARTNERS LLC
DOING BUSINESS AS AUTHENTIC 760, a
California limited liability company; IGS
SOLUTIONS LLC, a California limited
liability company; SHRYNE GROUP, INC., a
California corporation; STIIIZY, LLC, a
California limited liability company;
IRONWORKS COLLECTIVE, INC., DOING
BUSINESS AS BLAZE, a California
corporation; TONY HUANG, an individual;
and DOES 1–50, inclusive,

Defendants.

Case No.: CV2021-0426

**DECLARATION OF FRANK H. KIM IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

ADDITIONAL ATTORNEYS FOR PLAINTIFFS

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13 Attorneys for Defendants

STRATEGIC GREEN PARTNERS LLC, IGS SOLUTIONS LLC, SHRYNE GROUP, INC.,

14 STIIIZY, LLC, IRONWORKS COLLECTIVE, INC., and TONY HUANG

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1. I am an attorney licensed to practice law in the State of California, and the owner of Kim Legal, APC, attorney of record for Plaintiff Hunter Meelee in this matter. If called to testify, I could truthfully attest to the matters contained herein.

3. My opinion regarding the Settlement is based in substantial part on my qualifications and experience. I have been an active member of the California State Bar since 2009. I received my law degree from the University of California, Hastings College of the Law. After law school, I represented carriers in subrogation litigation at Gibson, Robb, Lindh, LLP and consumer finance lenders at Severson & Werson, APC and Bryan Cave, LLP (now Bryan Cave Leighton Paisner, LLP). In 2013, I joined the in-house legal team at Westlake Financial Services (“WFS”), the largest privately-held automobile finance lender with over \$10 billion in assets under management. In 2017, I was appointed as General Counsel, a position that I held until January 2020, when I decided to open my law practice.

4. During my time at WFS, I was responsible for managing nationwide litigation matters, including employment-related matters for a workforce of over 1,300 employees. I worked with outside counsel in California wage and hour class actions like *DeLeon, et al. v. Westlake Services, LLC*, (LASC BC526750) and *Yeganeh v Westlake Services, LLC* (LASC BC700568). I was also attorney of record for Western Funding Incorporated (a subsidiary of WFS) in *Western Funding Incorporated v. Vegas Valley Motors Corp* (LASC BC655813), where I obtained a trial verdict in the amount of \$1,730,000 and was awarded attorney fees at an hourly rate of \$695.

5. In 2020, I founded Kim Legal, APC (“Kim Legal”), a plaintiff’s employment law firm. I have been appointed class counsel in the following cases: *Smetana, et al. v. Quiktrak, Inc.*, which settled for \$1.65 million on behalf of 253 class members and Judge David R. Lampe awarded 40% in fees; *Wellinger v. Live Nation Worldwide, Inc.*, which settled for \$550,000 on behalf of 55 class members and Judge Yvette M. Palazuelos awarded 33% in fees; ; *Deskins v. Infosys Limited*, which settled for \$2,720,000 for aggrieved employees who worked about 136,642 pay periods and Judge Stephanie M. Bowick awarded 33% in fees; and *Wright v. GTW, LLC, et al.*, which settled for \$335,000 on behalf of 220 class members and Judge Elihu M. Berle preliminary awarded 33% in fees.

6. In addition, I am lead counsel or co-counsel in a number of pending employment wage-and-hour class actions and/or PAGA actions involving Labor Code violations, including: *Azima v. Big Hit Entertainment, et al.*, Superior Court for the County of Los Angeles (mediation pending); *Rivera v. L'Oreal USA SD, Inc., et al.*, Superior Court for the County of Los Angeles (litigation ongoing); *Saravia v. John McNeil Studio, Inc.*, Superior Court for the County of Alameda (litigation ongoing); *DeBuck v. Object and Animal USA, Inc.*, Superior Court for the County of Los Angeles (litigation ongoing); *Wright v. Home Box Office, Inc., et al.*, Superior Court for the County of Los Angeles (settlement pending); *Bandara v. Bonobos, Inc., et al.*, Superior Court for the County of Los Angeles (approval pending); *Pearson v. West Brands, LLC, et al.*, Superior Court for the County of Los Angeles (mediation pending); *Leslie v. Yeezy Apparel LLC*, Superior Court for the County of Los Angeles (mediation pending); *Azima v. Netflix Productions, LLC*, Superior Court for the County of Los Angeles, (mediation pending); *Tehrani v. Amazon Studios, LLC*, Superior Court for the County of Los Angeles, (mediation pending); *Bardet v. WAD Productions*, Superior Court for the County of Los Angeles, (litigation ongoing); *Benzakour v. F45 Training Incorporated*, Superior Court for the County of Los Angeles, (litigation ongoing); and *Lara v. Twentieth Century*, Superior Court for the County of Los Angeles, (litigation ongoing).

7. I do not have any conflicts of interest with the State or with the Plaintiffs. I am not related to the proposed Class Representatives. I have not previously represented any of the

1 Defendants in any matter. I do not have an interest or relationship, financial or otherwise, with the
2 proposed administrator.

3 I swear under penalty of perjury under the laws of the State of California that the foregoing
4 is true and correct, this 24th day of October, 2023, at Los Angeles, California.

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6 /s/ Frank H. Kim

7 FRANK H. KIM
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