

ELECTRONICALLY FILED
by Superior Court of CA,
County of Yolo,
on 1/12/2024 5:48 PM
By: N. Lorenzo, Deputy

HELEN U. KIM, State Bar No. 260195
helen@helenkimlaw.com
HELEN KIM LAW, APC
3435 Wilshire Blvd, Suite 2700
Los Angeles, CA 90010
Telephone: (323) 487-9151

FRANK H. KIM, State Bar No. 264609
fkim@kim-legal.com
KIM LEGAL, APC
3435 Wilshire Blvd, Suite 2700
Los Angeles, CA 90010
Telephone: (323) 482-3300

Attorneys for Plaintiff HUNTER MEELEE
(Additional attorneys on following page)

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 HELEN U. KIM IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

**DECLARATION OF HELEN U. KIM IN SUPPORT OF UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**

ADDITIONAL ATTORNEYS FOR PLAINTIFFS

JOSEPH TOJARIEH (SBN 265492)
jft@stonebrooklaw.com
STONEBROOK LAW
10250 Constellation Boulevard, Suite 100
Los Angeles, CA 90067
Telephone: (310) 553-5533 ext. 101
Facsimile: (310) 553-5536

Attorneys for Plaintiffs
JENICA COLE and SHAUNA ADAMS

DAVID G. SPIVAK (SBN 179684)
david@spivaklaw.com
MAYA CHEAITANI (SBN 335777)
maya@spivaklaw.com
THE SPIVAK LAW FIRM
8605 Santa Monica Blvd.
PMB 42554
West Hollywood, CA 90069
Telephone: (213) 725-9094
Facsimile: (213) 634-2485

WALTER L. HAINES (SBN 71075)
walter@uelglaw.com
UNITED EMPLOYEES LAW GROUP
4276 Katella Ave, Suite 301
Los Alamitos, CA 90720
Telephone: (562) 256-1047
Facsimile: (562) 256-1006

Attorneys for Plaintiff
KASSANDRA MENDIVIL

DANIEL FRANKLIN GAINES (SBN 251488)
daniel@gaineslawfirm.com
GAINES & GAINES, APLC
4550 E. Thousand Oaks Blvd., Ste 100
Westlake Village, CA 91362
Telephone: (818) 703-8985
Facsimile: (818) 703-8984

ALEX PAUL KATOFISKY (SBN 202754)
alex@gaineslawfirm.com
GAINES & GAINES, APLC
4550 E Thousand Oaks Blvd, Ste 100
Westlake Village, CA 91362-3824
Telephone: (818) 703-8985
Facsimile: (818) 703-8984

1 Attorneys for Plaintiffs
JENICA COLE and SHAUNA ADAMS

3 MATTHEW L. MANN (SBN 276220)
mmann@mannrogal.com
4 JUSTIN R. ROGAL (SBN 273352)
jrogal@mannrogal.com
5 MANN ROGAL PC
3055 Wilshire Boulevard, Suite 630
6 Los Angeles, California 90010
Telephone: (310) 620-2314
7 Facsimile: (310) 620-2314

8 Attorneys for Plaintiff
RICHARD BAUTISTA

10 HAROUT A. MESSRELIAN (SBN 272020)
hm@messrelilianlaw.com
11 MESSRELIAN LAW INC.
500 N Central Ave., Ste 840
12 Glendale, CA 91203
Telephone: (818) 484-6531
13 Facsimile: (818) 956-1983

14 Attorneys for Plaintiff
MICHAEL NEVAREZ

16 MARCUS JOSEPH BRADLEY (SBN 174156)
mbradley@bradleygrombacher.com
17 BRADLEY/GROMBACHER LLP
31365 Oak Crest Dr., Ste 240
18 Westlake Village, CA 91361-5600
Telephone: (805) 270-7100
19 Facsimile: (805) 270-7589

20 SAHAG MAJARIAN, II (SBN 146621)
sahagii@aol.com
21 MAJARIAN LAW GROUP
18250 Ventura Bl.
22 Tarzana, CA 91356
Telephone: (818) 609-0807
23 Facsimile: (818) 609-0892

24 Attorneys for Plaintiff
25 JOE NUNEZ

1 CHANTAL RENEE MCCOY PAYTON (SBN 293215)

CPayton@PaytonEmploymentLaw.com

2 PAYTON EMPLOYMENT LAW PC

3807 W. Sierra Highway, Ste 206

3 Acton, CA 93510

Telephone: (661) 434-1144

4 Facsimile: (661) 434-1144

5
6 **ATTORNEYS FOR DEFENDANTS**

7 TODD B. SCHERWIN (SBN 239848)

tscherwin@fisherphillips.com

8 CHRISTOPHER D. CHAPLIN (SBN 272337)

cchaplin@fisherphillips.com

9 ARIELLA M. KUPETZ (SBN 332736)

akupetz@fisherphillips.com

10 FISHER & PHILLIPS LLP

444 South Flower Street, Suite 150

11 Los Angeles CA 90071

Telephone: (213) 330-4500

12 Facsimile: (213) 330-4501

13 Attorneys for Defendants

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

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

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

I, Helen U. Kim, declare:

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

2. My co-counsel and I have fully investigated the claims alleged and defenses raised in this lawsuit, including interviews with Plaintiff and witnesses we have contacted through Plaintiff, the review of documents provided by Plaintiff, and the informal exchange of data in preparation for mediation in this litigation. I attended the mediation on June 15, 2022, with mediator Steve Pearl, Esq., and participated in the subsequent continued negotiations that ultimately resulted in the settlement of the claims in this case.

3. Based on my investigation and evaluation, I am of the opinion that the Settlement with Defendants for the consideration and on the terms set forth in the Class Action and PAGA Settlement Agreement (“Settlement Agreement” or “Settlement”) is fair, reasonable, and adequate and is in the best interest of the settlement class in light of all known facts and circumstances, including the risk of significant delay, defenses asserted by Defendants, and numerous potential appellate issues.

4. I am one of Class Counsel in this matter. My qualifications are as follows: I received my J.D. from the University of California, Hastings College of the Law in 2008. Following law school, I practiced Plaintiff's employment litigation from 2009 until 2014 at various boutique Plaintiffs' law firms in Southern California, including the deRubertis Law Firm, APC, and Arias Ozzello & Gignac LLP. In 2014, I opened my own law office where I continue to work in exclusively Plaintiff's employment litigation.

5. Over the years, I have represented employees in a variety of employment related disputes, including discrimination claims based on race, gender, national origin, age or disability, sexual harassment, whistleblower cases, contract and tort cases. I was recognized by the California Super Lawyers Magazine as a Southern California Rising Star every year from 2016 through 2021. From 2018 through 2021, I was recognized as one of the Up-and-Coming 50 Women Lawyers by

the California Super Lawyers magazine. Since 2022, I was recognized as one of the Superlawyers by the same publication.

6. Since opening my law office in 2014, I have served as lead counsel and resolved several wage-and-hour class actions and PAGA actions before the Los Angeles County Superior Court, including but not limited to: *Brown v. Mitrani USA Corp.*, Los Angeles County Superior Court Case No. BC571694, and *Rivera v. Bronze-Way Plating Corp., et al.*, Los Angeles County Superior Court Case No. BC604167, and *Warren v. Wolfgang Puck Catering and Events, LLC*, Riverside County Superior Court Case No. RIC11717802.

7. 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).

8. 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.

5
6 /s/ Helen U. Kim

7 HELEN U. KIM
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27