

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  
Facsimile: (866) 652-7819

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  
Facsimile: (866) 652-7819

*Attorneys for Plaintiffs EMMANUEL WRIGHT, ASHLEY DIANA CURRIE, KARIM BENZAKOUR, and RANDAL DAVIS*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

EMMANUEL WRIGHT, individually and on behalf of all others similarly situated, and in his representative capacity; ASHLEY DIANA CURRIE, individually and on behalf of all others similarly situated; KARIM BENZAKOUR, individually and on behalf of all others similarly situated; and RANDAL DAVIS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

GWE, LLC, a foreign limited liability company; WPP Group USA, Inc., a foreign corporation; and DOES 1 through 50, inclusive,

Defendants.

**Case No.: 21STCV03820**

[Case Assigned for All Purposes to Hon. Elihu M. Berle in Dept. 6]

**DECLARATION OF HELEN U. KIM IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR PRELIMINAR APPROVAL OF  
CLASS ACTION SETTLEMENT**

Date: June 17, 2022  
Time: 9:00 a.m.  
Dept.: 6

Complaint Filed: February 1, 2021  
Trial Date: None Set

1 I, Helen U. Kim, state and declare as follows:

2 1. I am an attorney admitted before all courts of the State of California. I am the  
3 owner of Helen Kim Law, APC, counsel of record for Plaintiffs Emmanuel Wright, Ashley  
4 Diane Currie (incorrectly named as Ashley Diana Currie), Karim Benzakour, and Randal Davis  
5 (together, "Plaintiffs") in this action. I submit this declaration in support of Plaintiffs'  
6 Unopposed Motion for Preliminary Approval of Class and Representative Action Settlement. I  
7 have personal knowledge of the facts set forth in this declaration and could and would testify to  
8 them if called upon to do so.

9 2. I was involved in all aspects of this lawsuit, including: corresponding with  
10 Plaintiff Emmanuel Wright since the inception of his case, evaluating his claims prior to filing  
11 the instant action, the drafting of the complaint, preparing discovery, creating a litigation  
12 strategy, speaking to potential witnesses, potential plaintiffs, and putative class members,  
13 reviewing client documents, reviewing class-wide time/payroll data, preparing the mediation  
14 brief, and the mediation in this case, conferring with Plaintiff Wright and co-counsel regarding  
15 case status and strategy, consulting with numerous witnesses, reviewing the settlement  
16 memorandum and settlement agreement, and associated documents, reviewing the motion for  
17 preliminary approval of class action settlement, and performing legal research throughout the  
18 case. I was involved in determining the case prosecution strategy as well as determining specific  
19 tactics at various points in the case.

20 3. Based upon my involvement in this case and for the reasons set forth below in this  
21 declaration, the \$335,000 settlement achieved in this case is fair, adequate and reasonable. In  
22 reaching the agreed-upon Settlement, I considered, among other factors, the risks of continued  
23 litigation and risks associated with class certification and/or a PAGA trial on the merits.

24 4. This case has a litigation history of more than a year. As of May 6, 2022, I  
25 expended approximately 27 hours in this litigation. My lodestar as of May 6, 2022 is  
26 approximately \$16,875. I expect that I will incur approximately 15 additional hours of time to  
27 see this case through completion of the settlement, including: finalizing and filing these  
28 preliminary approval papers; working with Defendants and the Settlement Administrator to

1 distribute the Notices; supervising the Notice distribution; responding to inquiries or challenges  
2 from the Settlement Class; responding to any request for exclusion or objections; preparing and  
3 filing final approval papers, including a final motion for a class representative enhancement  
4 award and an attorneys' fee and costs award; attending the final approval hearing; working with  
5 Defendants and the Settlement Administrator on the distribution of awards to the Settlement  
6 Class Members; monitoring the award distributions to the Settlement Class Members; and  
7 reporting to the Court that the distribution of settlement funds has been completed.

8         5. I am one of Class Counsel in this matter. My qualifications are as follows: I  
9 received my J.D. from the University of California, Hastings College of the Law in 2008.  
10 Following law school, I practiced Plaintiff's employment litigation from 2009 until 2014 at various  
11 boutique Plaintiffs' law firms in Southern California, including the deRubertis Law Firm, APC,  
12 and Arias Ozzello & Gignac LLP. In 2014, I opened my own law office where I continue to work  
13 in exclusively Plaintiff's employment litigation. I have been recognized by the California Super  
14 Lawyers Magazine as a Southern California Rising Star every year since 2016. Since 2018, I have  
15 been recognized as one of the Up-and-Coming 50 Women Lawyers by the California Super  
16 Lawyers magazine.

17         6. Since opening my law office in 2014, I have served as lead counsel and resolved  
18 several wage-and-hour and PAGA actions before the Los Angeles County Superior Court: *Brown*  
19 *v. Mitrani USA Corp.*, Los Angeles County Superior Court Case No. BC571694, *Rivera v. Bronze-*  
20 *Way Plating Corp., et al.*, Los Angeles County Superior Court Case No. BC604167, and *Warren*  
21 *v. Wolfgang Puck Catering and Events, LLC*, Riverside County Superior Court Case No.  
22 RIC11717802. In addition, throughout my legal career, including before I opened my law office,  
23 I have represented a number of individual plaintiffs in wage and hour actions (as well as plaintiffs  
24 in wage-and-hour class actions) in California Superior Court. Accordingly, I have substantial  
25 experience in California wage-and-hour litigation and PAGA actions.

26         7. Together with my co-counsel in this case, I believe that the proposed Class Counsel  
27 have the necessary experience to be approved and should be approved as Class Counsel and I  
28 believe that this settlement is fair, reasonable, and adequate.

1 I declare under penalty of perjury under the laws of the California that the foregoing is  
2 true and correct. Executed this 6th day of May, 2022, in Los Angeles, California.

3  
4 /s/ Helen U.. Kim

Helen U. Kim  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

(PROOF OF SERVICE)  
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 3435 Wilshire Blvd., Suite 2700, Los Angeles, CA 90010.

On May 6, 2022, I served all interested parties in this action the following documents described as: **DECLARATION OF HELEN U. KIM IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

**[XX] BY ELECTRONIC SERVICE:** I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

**[XX] BY ELECTRONIC MAIL TRANSMISSION:** I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

**[XX] (STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 6, 2022, at Los Angeles, California.

/s/ Frank H. Kim

Frank H. Kim