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Attorneys for Plaintiff Sunny K. Tam, on behalf of himself
and other similarly-situated employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

SUNNY K. TAM, on behalf of himself and
other similarly-situated employees

Plaintiff,

v.

Q TECH CORPORATION, a California
Corporation; and DOES 1 Through 10,
inclusive,

Defendants.

Lead Case No. 21STCV18635

Related Case No. 21STCV19805

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Elihu M. Berle

Department SS6

**CLASS ACTION AND REPRESENTATIVE
ACTION**

**SUPPLEMENTAL DECLARATION OF
MICHAEL D. SINGER IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT, ATTORNEYS' FEES
AND COSTS, AND CLASS
REPRESENTATIVE SERVICE PAYMENT**

Hearing Information

Date: March 22, 2023

Time: 9:00 a.m.

Dept: SS-6

Judge: Hon. Elihu M. Berle

Complaint filed: May 17, 2021

Trial date: Not Set

1 I, Michael D. Singer, declare as follows:

2 1. I am a Partner with the law firm of Cohelan Khoury & Singer, co-counsel of record for
3 Plaintiff and the Settlement Class. I submit this Supplemental Declaration in Support of Plaintiff's
4 Motion for Order Granting Final Approval of Class Action Settlement, Entering Judgment, and
5 Awarding Attorneys' Fees and Costs and Class Representative Service Payment. The following facts
6 are within my personal knowledge, and if called to testify, I could and would competently testify to
7 them.

8 2. This declaration is intended to supplement my declaration filed on January 20, 2023.

9 3. As fully briefed in Plaintiff's Motion For Final Approval Of Class Action and PAGA
10 Settlement, Attorneys' Fees and Costs, and Class Representative Service Payment filed with this Court
11 on January 20, 2023, Plaintiff Sunny K. Tam seeks final approval of a \$650,000 non-reversionary wage
12 and hour class action and Private Attorneys General Act (PAGA) Settlement on behalf of 179 non-
13 exempt, hourly-paid employees of Defendant Q Tech Corporation (Defendant) (180 less the single
14 employee who requested exclusion) who worked in California at any time during the time period of
15 May 17, 2017, to March 13, 2022.

16 4. In addition, Plaintiff requests the Court approve the application of Class Counsel for an
17 award of \$216,666.67 for their attorneys' fees and \$15,658.84 in litigation expenses, a \$5,000 Service
18 Payment to Class Representative, and \$10,000 in fees and expense to the Court-appointed Settlement
19 Administrator ILYM Group, Inc.

20 5. ILYM Group, Inc., the Court-approved Settlement Administrator, has informed me that
21 as of the close of the February 21, 2023 Class Member Response Deadline and date of this declaration,
22 ILYM has received no Class Member objections to the Settlement, and only one (1) Class Member has
23 requested exclusion from the Settlement, which is a 99.44% participating rate of the 180 Settlement
24 Class Members.

25 6. The 179 participating Settlement Class Members will receive an estimated average gross
26 payment of \$1,820.41, with the estimated highest gross payment being \$2,963.46. Plaintiff's estimated
27 individual settlement amount is \$2,220.79.

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7. The request for reimbursement of costs is fair and reasonable. Class Counsel seeks reimbursement of \$15,658.84 in litigation expenses. Cohelan Khoury & Singer has incurred additional costs of \$114.53 since the filing the Motion for Final Approval on January 20, 2023. These costs are all necessary to the litigation and are approved in the Parties' Settlement Agreement. As such, these requests should be approved. Exhibit 1 is a true and correct copy of Cohelan Khoury & Singer and Stonebrook Law's Itemization of Costs.

8. On the same date this declaration and accompanying documents are filed with the Court, they will be provided to the LWDA via its website. Attached as Exhibit 2 is a true and correct copy of the LWDA Confirmation of Receipt.

I declare under penalty of perjury under the laws of the State of California this declaration is true and correct and signed March 10, 2023, in San Diego, California.


Michael D. Singer

EXHIBIT 1

COHELAN KHOURY SINGER**Litigation Costs****Tam v. Q Tech Corporation****L.A.S.C. Lead Case No. 21STCV18635****L.A.S.C. Related Case No. 21STCV19805**

<u>Date</u>	<u>Payee</u>	<u>Details</u>	<u>Amount</u>
5/17/2021	Express Network	Summons; Complaint; Addendum	\$1,615.50
5/25/2021	Steven J. Rotman, PC	Mediation Fee 12/13/21	\$9,000.00
5/27/2021	Express Network	Notice of Related Cases	\$35.00
6/29/2021	Express Network	Proof of Service	\$35.00
7/15/2021	Express Network	Courtesy Copy	\$45.00
7/24/2021	LA Court Connect	KDLR 7/19/21 (SC)	\$15.00
7/28/2021	Express Network	Notice of Continuance	\$90.00
1/11/2021	Berger Consulting	Statistician	\$2,100.00
1/7/2022	One Legal	Stipulation	\$16.68
1/7//22	One Legal	Stipulation and Order	\$12.35
1/13/2022	LASC	Document Download	\$2.00
1/13/2022	One Legal	Notice	\$16.68
3/28/2022	One Legal	Stipulation and Order	\$37.78
3/29/2022	One Legal	Stipulation and Order	\$42.21
3/30/2022	One Legal	Notice; Proof of Service	\$17.19
4/7/2022	One Legal	Notice	\$17.19
4/12/2022	One Legal	Stipulation and Order	\$12.87
4/13/2022	One Legal	Stipulation and Order	\$37.78
5/10/2022	LASC	Document Download	\$6.20
6/3/2022	One Legal	Stipulation	\$12.87
6/6/2022	One Legal	Stipulation and Order	\$37.78
6/10/2022	LASC	Document Download	\$4.00
6/13/2022	One Legal	Notice	\$17.19
6/22/2022	One Legal	Motion; Declaration	\$12.87
6/22/2022	One Legal	Stipulation and Order; Dec.	\$37.78
6/22/2022	One Legal	Stipulation and Order; Dec.	\$55.59
6/22/2022	One Legal	Motion for Prelim. Approval	\$80.82
6/22/2022	One Legal	Moiton; Declaration	\$78.96
7/19/2022	One Legal	Amended Complaint; Dec.	\$54.31
7/19/2022	One Legal	Notice	\$56.37
7/19/2022	One Legal	Notice; Declaration	\$17.19
7/20/2022	One Legal	Notice	\$17.19
7/20/2022	One Legal	Amended Complaint; Dec.	\$17.19
8/9/2022	Case Anywhere	5/10/22-7/31/22	\$223.50
8/10/2022	One Legal	Notice; Proof of Service	\$17.19
8/17/2022	One Legal	Notice	\$17.19
9/1/2022	One Legal	Supplemental Brief	\$74.90
9/1/2022	One Legal	Brief; Declaration; Order	\$17.19
10/4/2022	One Legal	Notice; Proof of Service	\$17.19

COHELAN KHOURY SINGER**Litigation Costs****Tam v. Q Tech Corporation****L.A.S.C. Lead Case No. 21STCV18635****L.A.S.C. Related Case No. 21STCV19805**

<u>Date</u>	<u>Payee</u>	<u>Details</u>	<u>Amount</u>
10/11/2022	One Legal	Notice	\$17.19
10/31/2022	One Legal	Supplemental Brief - Courtesy Copy	\$59.71
10/31/2022	One Legal	Brief; Declaration; Order	\$17.19
11/15/2022	Case Anywhere	8/1/22-10/31/22	\$219.00
11/18/2022	One Legal	Notice; Order; Proof of Service	\$17.19
11/18/2022	LASC	Document Download	\$2.00
11/18/2022	One Legal	Notice of Revised Class Action Sett.	\$52.25
1/20/2023	One Legal	Motion for Final Approval of Sett.	\$79.43
1/20/2023	One Legal	Motion for Final Appr. Courtesy Copy	\$66.92
3/1/2023	Case Anywhere	11/1-1/31/23	\$201.00
	In House	Postage	\$6.26
	In House	Photocopies (230@.25)	\$57.50
<i>Est</i>	<i>Case Anywhere</i>	<i>2/1-4/30/23</i>	<i>\$150.00</i>
<i>Est</i>	<i>Case Anywhere</i>	<i>5/1-7/31/23</i>	<i>\$150.00</i>
<i>Est</i>	<i>Case Anywhere</i>	<i>8/1-10/31/22</i>	<i>\$150.00</i>
	Total:		\$15,267.34

Tam v. Q-Tech Corporation
Case Costs

#	Payee	Payor	Description	Amount
1	Case Anywhere	TLF	Case Anywhere Invoice for System Access Fee during 5/10/22 - 7/31/22	\$121.50
2	Case Anywhere	TLF	Case Anywhere Invoice for System Access Fee during 8/1/22 - 10/31/22	\$135.00
3	Case Anywhere	TLF	Case Anywhere Invoice for System Access Fee during 11/1/22 - 1/31/22	\$135.00
			Total:	\$391.50

EXHIBIT 2