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Attorneys for Plaintiff
Destinee Nicole Robinson-Moore

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

DESTINEE NICOLE ROBINSON-MOORE,
individually and on behalf of all similarly
situated individuals,

Plaintiff,

vs.

MEDIA ALL STARS, INC., a California
Corporation, and DOES 1 to 100,

Defendants.

Case No. 37-2021-00050573-CU-OE-CTL

**DECLARATION OF THEODORE R.
TANG IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: February 3, 2023
Time: 9:00 a.m.
Dept.: C-60

Complaint Filed: December 2, 2021
Trial Date: None Set

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I, Theodore R. Tang, declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am with the law firm Frontier Law Center, counsel of record for Plaintiff Amy Migdal (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. From the inception of the case, Class Counsel have zealously represented the interests of the Class. Class Counsel engaged in significant discussions with opposing counsel to obtain informal data on behalf of the Class. This settlement was obtained for the benefit of the Class, as opposed to the individual Class Representative.

3. My co-counsel and I will adequately represent the Class Members in this action. Class Counsel have and will zealously represent Plaintiff and the Class and pursue this lawsuit to its conclusion.

4. I have spent significant time researching and pursuing the claims that have been alleged in this action. The Parties engaged in formal and informal discovery and participated in the exchange of class data and Defendants' pertinent policies and practices. Based on my review of all the documents and information, and based on my experience in class action litigation, I believe this settlement to be fair, adequate, and reasonable.

5. I was retained based upon a contingency fee arrangement wherein Plaintiff's counsel agreed to advance all costs and receive no fee unless a recovery was accomplished. Specifically, had Plaintiff failed to prevail in this case, counsel for Plaintiff would have spent a significant amount of time, money and other resources without any benefit or return. In addition, had Plaintiff also failed to prevail in the present case, Defendants would have been able to seek costs in connection with their defense of the case.

6. I am one of the primary attorneys on this matter. My qualifications are as follows: I received my J.D. from The University of California Los Angeles School of Law in 2016. During law school, I was a summer certified law student at the Riverside County District Attorney's Office and achieved Moot Court Honors. While awaiting Bar Exam

1 results, I was accepted into the Los Angeles City Attorney's Academy of Justice Program,
2 where I was assigned to a trial department, and after being sworn in, conducted trials on behalf
3 of the City of Los Angeles.

4 7. My primary practice is employment law, and has been since joining Frontier
5 Law Center in 2017. I have handled a number of wage and hour matters including class
6 actions, individual actions, and PAGA cases on the Plaintiff's side. My practice encompasses
7 cases in counties throughout the State of California, as well as the United States District
8 Courts for the Central, Eastern, Northern, and Southern Districts of California. I have been
9 named as Class Counsel in a number of cases, and have been granted final approval in many of
10 those.

- 11 8. Wage and Hour Class and PAGA actions I have been counsel for include:
- 12 a. *Amy Migdal v. Purple Communications, Inc.*, Case No. S-CV-0046377, class
13 action and PAGA case on behalf of approximately 70 individuals relating to
14 regular rate of pay for sick time, \$127,500 settlement; preliminary approval
15 granted, pending final approval.
- 16 b. *In re: Arya Security Services Wage and Hour Cases*, Case No. JCCP 4991, class
17 action litigation including involving meal and rest break violations, work
18 expense reimbursement, unpaid wages, untimely payment of wages, and other
19 allegations, final approval granted;
- 20 c. *Joshua Albright v. Loma Linda University Shared Services*, Case No.
21 CIVDS1818361, class action litigation involving meal and rest break violations
22 and work expense reimbursement for security personnel, final approval granted;
- 23 d. *Emma Hart v. Marriott International, Inc. et al*, Case No. 8:17-cv-02021-JVS-
24 KES, class action litigation involving wage and hour and tipping, final approval
25 granted;
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- 1 e. *James Rushing v. Security Intelligence Specialist Corporation*, Case No. 18-civ-
2 1808, class action and PAGA litigation on behalf of security guards for breaks
3 and wage statement violations, final approval granted;
4 f. *Tri Nguyen v First Alarm Security & Patrol, Inc.*, Case No. 18CV332369
5 (consolidated with *Alivia Sticklin v. First Alarm Security & Patrol, Inc.*, Case
6 No. 18CV323753): PAGA action on behalf of security guards involving wage
7 and hour issues, final approval granted;
8 g. *Kevin Hernandez v. Contemporary Services Corporation*, Case No. BC684206:
9 PAGA action on behalf of security guards involving wage and hour issues,
10 PAGA settlement approved; and
11 h. *Durand McAfee et al v. Chief Protective Services Inc.*, Case No. RIC1721984:
12 PAGA claim on behalf of security guards involving wage and hour issues,
13 PAGA settlement approved
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15 9. I am filing a copy of the Notice of Motion for Preliminary Approval of Class
16 Action Settlement and all supporting documents contemporaneously with filing this motion in
17 with the Court.

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

20 Executed on this 9th day of January 2023, at Vista, California.

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Theodore R. Tang