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6 individually and on behalf of similarly situated employees

7 [additional parties continued on next page]

8
9 **SUPERIOR COURT OF CALIFORNIA**
10 **FOR THE COUNTY OF SAN JOAQUIN**

11 ELIZABET SANCHEZ and GRISELDA
12 RAMIREZ, individually and on behalf of all
other similarly situated employees,
13 Plaintiffs,

14 vs.

15 PACIFIC COAST PRODUCERS, a California
16 Corporation; and DOES 1 to 100, inclusive,
17 Defendants.

Case No. STK-CV-UOE-2021-11106

*Assigned for All Purposes to Hon. Robert T.
Waters, Department 11B*

CLASS ACTION

**DECLARATION OF DANIEL J. HYUN IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

18 Date: _____
19 Time: 9:00 a.m.
20 Dept.: 11B
Judge: Hon. Robert T. Waters

21 Filed: December 7, 2021
22 FAC Filed: February 14, 2022
23 SAC Filed: March 29, 2023
24 TAC Filed: September 19, 2023
Trial Date: None Set

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15 Attorneys for Plaintiff GRISELDA RAMIREZ

16 individually and on behalf of similarly situated employees

1 I, Daniel J. Hyun, declare:

2 1. I am an attorney at law duly admitted to practice before all the courts of the State of
3 California and an attorney of record for Plaintiff Griselda Ramirez (“Plaintiff”) herein. I am making this
4 declaration on behalf of the named plaintiffs, the putative class members, and in support of Plaintiffs’
5 Motion for Preliminary Approval of Class Action and PAGA Settlement (“Motion”). I have personal
6 knowledge of the matters set forth herein, and, if called as a witness, could competently testify thereto.

7 2. I am familiar with California law governing wages, reimbursement, and other entitlements
8 owed to employees, including, but not limited to, the relevant statutes at issue in this case such as
9 California Labor Code sections 201, 201.3, 201.5, 201.6, 201.9, 202, 202, 203, 204, 204.1, 204.2, 206,
10 210, 216, 221, 222, 223, 226, 226.3, 226.7, 227.3, 245, 245.8, 246, 246.5, 247, 248.5, 256, 351, 352, 353,
11 432, 432.5, 432.7, 510, 512, 558, 558.1, 1024.5, 1174, 1174.5, 1194, 1194.2, 1197 et seq., 1197.1, 1198,
12 1198.5, 1199, 2100 et seq, 2699, 2699.3, 2699.5, 2800, 2802, 2810.5, and applicable IWC Wage Orders,
13 and California Code of Regulations, Title 8, section 11000 et seq., and California Business and
14 Professions Code sections 17200 et seq.

15 3. The Law Office of Daniel J. Hyun prosecutes wage and hour cases, including class
16 actions on behalf of employees and others who have had their rights violated. The Firm, either on its
17 own, or with co-counsel is currently serving as plaintiffs’ counsel of record in dozens of wage and hour
18 and employment class action cases pending throughout the State of California.

19 4. The attorneys working on this case have been appointed class counsel in many cases,
20 through both contested motions and settlement approval motions.

21 5. I have been appointed class counsel and/or had my attorney’s fees approved in at least
22 the following class actions and/or representative PAGA actions: *Bedoy v. ATN Window and Door Corp.*
23 *et al.*, Case No. CIVRS1307735 (San Bernardino County Superior Court) – \$235,000.00 wage and
24 hour class action settlement on behalf of non-exempt manufacturing and construction employees;
25 *Bronson v. Mohammad Reza Neal, M.D., Inc.*, Case No. 30-2016-00860352-CU-OE-CXC (Orange
26 County Superior Court) – \$300,000.00 wage and hour class action settlement on behalf of non-exempt
27 employees working in the medical industry; *Garcia v. Miguel Cuevas et al.*, Case No. HG13701393
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(Alameda County Superior Court) – \$1,300,000.00 wage and hour class action settlement on behalf of delivery drivers misclassified as independent contractors; *Garcia v. Unifirst Corporation*, Case No. 21STCV41324 (Los Angeles County Superior Court) - \$675,000.00; *Hale v. Orange County Rescue Mission, Inc.*, Case No. 30-2018-00970414-CU-OE-CXC (Orange County Superior Court) – \$300,000.00 wage and hour class action settlement on behalf of non-exempt hourly employees; *In re: Hacor Wage and Hour Employment Practices Litigation*, Case No. BC522220 (Los Angeles County Superior Court) – \$3,000,000.00 wage and hour class action settlement on behalf of non-exempt managers and other employees in the food catering and distribution industry; *Martinez v. Market Driven, LLC*, Case No. 19STCV38888 (Los Angeles Superior Court) - \$61,000.00 PAGA settlement on behalf of catering employees; *Martinez v. L.A.R.K. Industries, Inc.*, Case No. 30-2019-01110981-CU-OE-CXC (Orange County Superior Court) - \$800,000.00 wage and hour class action settlement on behalf of construction workers; *Orozco v. Fleetwood Aluminum Products, Inc.*, Case No. RIC1703488 (Riverside County Superior Court) – \$685,000.00 wage and hour class action settlement on behalf of non-exempt employees working in the manufacturing industry; *Osuna v. J&A Rents & Sells, Inc.*, Case No. BC536586 (Los Angeles County Superior Court) – \$450,000.00 wage and hour class action settlement on behalf of non-exempt employees working in the party rental industry; *Reyes v. PSLQ, Inc.*, Case No. MCC1400703 (Riverside County Superior Court) – \$75,000.00 wage and hour class action settlement on behalf of construction yard employees; *Romero v. Delivery Drivers, Inc. et al.*, Case No. 30-2015-00774687-CU-OE-CXC (Orange County Superior Court) – \$535,000.00 wage and hour class action settlement on behalf of misclassified delivery drivers; and *Rojas v. Constellation Homebuilder Systems, Inc.*, Case No. 37-2019-00035229-CU-OE-CTL (San Diego Superior Court) - \$1,350,000.00 wage and hour class action settlement on behalf of salespersons.

6. All cases cited above were successfully resolved for the classes and/or aggrieved employees.

7. I served as plaintiffs’ counsel of record in the following cases in which the courts granted plaintiffs’ motion for class certification: *Gamboa v. Kamran Staffing Inc. et al.*, Case No. CIVDS1605273 (San Bernardino County Superior Court) and *Grant et al. v. Car Spa, Inc.*, Case No.

1 RIC1310176 (Riverside County Superior Court).

2 8. In addition to the cases cited above, I served as plaintiffs' counsel of record in *at least*
3 the following employment class actions, consumer class actions, and/or representative actions in state
4 or federal court: *Alix v. House of Imports*, Case No. 30-2017-00965169-CU-OE-CXC (Orange County
5 Superior Court); *Boyack v. Salon Management Corp. et al.*, Case No. 8:18-cv-01233 (Central District
6 of California); *Cardena v. Currency Capital, LLC*, Case No. 30-2018-01041233-CU-OE-CXC (Orange
7 County Superior Court); *Carranza v. Southern California Discount Tire Co., Inc.*, Case No. 30-2018-
8 01016028-CU-OE-CXC (Orange County Superior Court); *Cox v. Cuttwood, LLC et al.*, Case No. 30-
9 2016-00838588 (Orange County Superior Court); *Crandall v. Maxim Healthcare Services, Inc.*, Case
10 No. 30-2017-00940239-CU-OE-CXC (Orange County Superior Court); *Delgado v. Desert Concepts*
11 *Construction, Inc.*, Case No. PSC1603866 (Riverside County Superior Court); *Fajardo v. Centaurus*
12 *Financial, Inc.*, Case No. 30-2016-00877483-CU-OE-CXC (Orange County Superior Court); *Farran*
13 *v. Doordash, Inc.*, Case No. 30-2018-00992677-CU-OE-CXC (Orange County Superior Court); *Garcia*
14 *v. Emerald Landscape Services, Inc.*, Case No. 30-2018-01011098-CU-OE-CXC (Orange County
15 Superior Court); *Garcia v. Emerald Landscape Services, Inc.*, Case No. 30-2018-01032804-CU-OE-
16 CXC (Orange County Superior Court); *Gomez v. Atlas Copco Mafi-Trench et al.*, Case No. 30-2018-
17 01016730-CU-OE-CXC (Orange County Superior Court); *Gonzalez v. Artistic Maintenance, Inc.*, Case
18 No. 30-2014-00699576-CU-OE-CXC (Orange County Superior Court); *Guthridge v. Nationstar*
19 *Mortgage, LLC*, Case No. 30-2018-01023680-CU-OE-CXC (Orange County Superior Court);
20 *Gutierrez et al. v. Bender Ready Mix, Inc.*, Case No. 30-2016-00884715-CU-OE-CXC (Orange County
21 Superior Court); *Martinelli v. Penhall Co.*, Case No. 30-2018-00998193-CU-OE-CXC (Orange County
22 Superior Court); *Medina v. Katzkin Leather, Inc.*, Case No. BC680102 (Los Angeles County Superior
23 Court); *Mustedanagic v. Hoag Memorial Hospital Presbyterian*, Case No. 30-2018-01011782-CU-OE-
24 CXC (Orange County Superior Court); *Padilla v. Orkin, LLC*, Case No. CIVDS1819296 (San
25 Bernardino County Superior Court); *Perez v. Wireless World LLC et al.*, Case No. 30-2018-01016025-
26 CU-OE-CXC (Orange County Superior Court); *Ryder v. Genpact*, Case No. 30-2018-00974115-CU-
27 OE-CXC (Orange County Superior Court); *Sanchez v. Jetblue Airways Corp.*, Case No. BC719081
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(Los Angeles County Superior Court); *Sarraf v. Employbridge, LLC et al.*, Case No. 30-2018-01017401-CU-OE-CXC (Orange County Superior Court); *Sessions v. Nightingale Nurses, LLC*, Case No. RG18922402 (Alameda County Superior Court); *Solis v. Integral Senior Living, LLC*, Case No. 30-2018-01015988-CU-OE-CJC (Orange County Superior Court); *Tiedemann v. KDB Restaurants, LLC*, Case No. CGC-15-544994 (San Francisco County Superior Court); *Velasquez v. IEC Corporation*, Case No. 30-2018-01014630-CU-OE-CXC (Orange County Superior Court); *Whisler v. Simpson Irvine, Inc. et al.*, Case No. 30-2018-01032237-CU-OE-CXC (Orange County Superior Court); *Whitaker v. U.S. Renal Care, Inc.*, Case No. BC649682 (Los Angeles County Superior Court); *Yahoo! Inc. Private Information Disclosure Cases*, Case No. JCCP 4895 (Orange County Superior Court); and *Zrinski v. Rubio's Restaurants, Inc.*, Case No. 30-2018-01015274-CU-OE-CXC (Orange County Superior Court).

9. I currently serve as plaintiffs' counsel of record in at least the following employment class actions and/or representative actions: *Arellano v. Vision Scenery Corporation, Inc.*, Case No. 21STCV35878 (Los Angeles County Superior Court); *Corona v. Exquisite Apparel Corp. et al.*, Case No. 21STCV02421 (Los Angeles County Superior Court); *Cruz v. Nason Roofing, Inc.*, Case No. 30-2021-01235276-CU-OE-CXC (Orange County Superior Court); *Duarte v. Arriaga USA, Inc.*, Case No. 21STCV14446 (Los Angeles County Superior Court); *Guardado v. Millennium Reinforcing, Inc.*, Case No. 20STCV39672 (Los Angeles Superior Court); *Javier v. Webster Bros. Concrete Construction, Inc.*, Case No. 20STCV27129 (Los Angeles County Superior Court); *Kimber v. Lee & Associates Commercial Real Estate Services, Inc. – City of Industry et al.*, Case No. 22STCV04738; *Lopez v. Empire Connect, LLC*, Case No. 21STCV44777; *Lopez v. Northern Café et al.*, Case No. 20STCV04625 (Los Angeles County Superior Court); *Lopez v. Empire Connect, LLC, et al.*, Case No. 21STCV44777 (Los Angeles County Superior Court); *Lopez v. The Highest Craft, LLC et al.*, Case No. CVRI2100648 (Riverside Superior Court); *Martinez v. L.A.R.K. Industries, Inc.*, Case No. 30-2019-01110981 (Orange County Superior Court); *Perez v. Velvet Yogurt, Inc.*, Case No. 30-2021-01221399-CU-OE-CXC (Orange County Superior Court); *Quiroz v. Coffman Specialties, Inc.*, Case No. 37-2020-00022698-CU-OE-CTL (San Diego Superior Court); *Ramirez v. Casa Orozco Incorporated et al.*, Case

No. RG21091979 (Alameda County Superior Court); *Ramirez v. Pacific Coast Producers*, Case No. STK-CV-UOE-2022-0010664 (San Joaquin County Superior Court); *Reese v. SGM, Inc. et al.*, Case No. CIVSB2106217; *Rosas v. Sierra Pacific Refrigerated Services, LLC et al.*, Case No. CV-21-003621 (Stanislaus County Superior Court); *Ruiz v. Lion Foods*, Case No. 21CV386961 (Santa Clara Superior Court); *Saenz v. Class Leasing*, Case No. CVRI2205259 (Riverside County Superior Court); *Segal, et al. v. Beverly Hills Properties, LLC*, Case No. 21STCV34228 (Los Angeles County Superior Court); *Sheppard v. Bekins Moving Solutions, Inc.*, Case No. 21STCV44484 (Los Angeles County Superior Court); and *Vazquez v. GDT Framing, Inc.*, Case No. CVRI2104512 (Riverside Superior Court).

10. I attended college at the University of California San Diego, where I double majored in Political Science: Public Law and Communications. I received my Bachelor of Arts for both majors in 2007 and was awarded multiple Provost's Honors.

11. I graduated from Washington University in St. Louis School of Law ("WUSTL School of Law"), where I received my J.D. in 2014 and studied as a visiting scholar at the University of California Los Angeles School of Law during the 2013-2014 school year. Both law schools are consistently ranked in the top 20 law schools by U.S. News & World Report. During law school, I was a Scholar in Law recipient, a CALI Award Winner for Mediation Theory and Practice, made the Dean's List for being in the top 20% of my class, and was an Associate Editor for WUSTL School of Law's Journal of Law & Policy.

12. During law school, in the summer of 2011, I began working as a Law Clerk at an established plaintiffs'-side employment class action law firm – Jose Garay, APLC ("Garay Law"). I continued to clerk part-time during law school and full-time during summers. As a Law Clerk for Garay Law, I drafted countless class action complaints, discovery requests and responses, and motions; attended hearings under the supervision of attorneys; worked closely with expert witnesses and created damage analyses for mediations; drafted mediation briefs and attended mediations, including the mediation for *Thomas v. Cognizant Technology Solutions U.S. Corporation*, Case No. SACV 11-1123 (Central District of California) which resulted in a \$4,000,000.00 settlement on behalf of non-exempt

1 computer software engineers who were misclassified as exempt employees under California's
2 computer professional exemption.

3 13. During law school, I also took business school courses at Washington University in St.
4 Louis Olin Business School. Upon graduating law school in 2014, I took and passed the July 2014
5 California Bar Exam.

6 14. After investing in and operating a start-up company, I began practicing law as an
7 attorney in 2016. I began working as an associate for Garay Law, primarily litigating wage and hour
8 class actions, and handling all facets of litigation, including, but not limited to, drafting
9 correspondences, pleadings, discovery, settlement agreements, and motions, making appearances and
10 handling hearings, defending depositions, working with expert witnesses and attending mediations, and
11 creating damage analyses.

12 15. I also worked as an associate in Bisnar Chase LLP's class action department. While
13 working at Bisnar Chase, in addition to other employment and consumer class actions, I litigated the
14 data breach class action lawsuit titled *Yahoo! Inc. Private Information Disclosure Cases*, Case No.
15 JCCP 4895 (Orange County Superior Court) that affected millions of Americans. As part of the *Yahoo*
16 data breach class action, I worked closely with co-counsel Robinson Calcagnie, Inc. by reviewing
17 thousands of documents, drafting internal memorandums, and preparing the deposition outline and
18 attending the deposition of Yahoo's head of cybersecurity. In addition, while at Bisnar Chase, I was
19 intricately involved in the class certification phase of the wage and hour class action titled *Grant et al.*
20 *v. Car Spa, Inc.*, Case No. RIC1310176 (Riverside County Superior Court). During litigation of the
21 *Grant* employment class action, I appeared and handled hearings, defended over a dozen putative class
22 member depositions and cross-examined witnesses, met and conferred with opposing counsel on
23 numerous occasions, and drafted pleadings and correspondences. The Riverside County Superior Court
24 granted plaintiffs' motion for class certification.

25 16. More recently, I worked for the well-known employment class action law firm – Aegis
26 Law Firm. As an associate for Aegis, I managed 25 to 30 employment class action cases handling all
27 aspects of litigation, including, but not limited to, drafting all notices, correspondences, pleadings,
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1 discovery, motions, settlements, and mediation briefs; working closely with expert witnesses for
2 mediations and class certification; attending mediations; appearing and handling all hearings for my
3 assigned cases; handling all depositions; corresponding with clients; and meeting and conferring with
4 opposing counsel. Of note, I was the primary attorney during significant portions of litigation in the
5 *Gamboa v. Kamran Staffing Inc. et al.*, Case No. CIVDS1605273 (San Bernardino County Superior
6 Court) employment class action. I drafted numerous pleadings, meet and confer correspondences,
7 discovery, and motions including plaintiff's motion for class certification; conferred with class
8 members and expert witness; defended numerous class member depositions and cross-examined
9 witnesses; and appeared and handled hearings, among other things. The San Bernardino County
10 Superior Court granted plaintiff's motion for class certification.

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12 17. In sum, for the past 13 years I have primarily focused on employment class actions and
13 played a critical role in obtaining millions of dollars on behalf of thousands of employees, both as an
14 attorney and as a law clerk.

15 18. In 2019, I founded the Law Office of Daniel J. Hyun, focusing on plaintiffs'-side
16 employment class actions. Although I provide pro bono legal services to low-income individuals in the
17 areas of contract, property, and criminal law, as well as other civil matters, my primary practice is
18 employment class actions. In addition, I have been a member of the American Bar Association,
19 American Association for Justice, Orange County Trial Lawyers Association, California Employment
20 Lawyers Association, California State Bar's Labor and Employment section, and Orange County Bar
21 Association.

22 19. I was selected as a Super Lawyers Rising Star by Thomson Reuters, representing one of
23 the top 2.5% of lawyers under 40 in Southern California in 2018, 2019, 2020, 2021, 2022, 2023, and
24 2024 in the practice area of Class Action & Mass Torts.

25 20. My office investigated the class and PAGA claims in this action by interviewing Plaintiff,
26 propounding discovery, meeting and conferring with Defendant, conferring with co-counsel, and filing
27 and opposing motions.

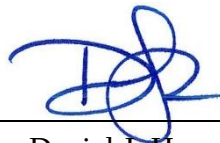
28 21. I have reviewed the Declaration of Justin P. Rodriguez and agree with his statements

1 regarding the case history and the assessment of the value of each of the Plaintiffs' claims.

2 22. Based on the evidence and likely testimony in this case, I believe the settlement before
3 the Court for approval represents a fair and reasonable compromise based on the realistic potential
4 recovery and is within the "ballpark" of a fair, reasonable, and adequate settlement of the wage and hour
5 class action and Private Attorneys General Act claims alleged in this case

6 23. I have spoken with every other attorney at my firm to determine whether they have any
7 relationship with either of the proposed *cy pres* beneficiaries. No attorneys in my firm have any
8 relationship with Capital Pro Bono, Inc., or the Center for Workers Rights.

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10 I declare under penalty of perjury under the laws of the State of California that the foregoing is
11 true and correct. Executed on January 23, 2024 in Fullerton, California.

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15 Daniel J. Hyun
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