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Attorneys for Plaintiff and the Class

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

AMIN AHMED, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

CAREDX, INC., a Delaware corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: 22-CIV-02294

(Assigned to the Hon. Marie S. Weiner, Dept. 2)

**DECLARATION OF KWANPORN “MAI”
TULYATHAN IN SUPPORT OF PLAINTIFF’S
MOTION FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: September 12, 2023

Time: 2:00 p.m.

Dept.: 2

Complaint Filed: June 6, 2022

FAC Filed: December 27, 2022

Trial Date: None Set

[illegible]

I, Kwanporn “Mai” Tulyathan, 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 Diversity Law Group, P.C., counsel of record for Plaintiff Amin Ahmed (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. Based on Class Counsel's independent investigations and evaluations, I am of the opinion that the settlement is fair, reasonable, and adequate, and is in the best interests of the Class Members, in light of all known facts and circumstances, and the expenses and risks inherent in litigation. The settlement was negotiated at arm's length and was reached only after the data for the class was produced and analyzed, and after substantial investigation and discussions regarding Defendant's wage statement practices and potential liability. Thus, this settlement should be granted final approval.

3. My qualifications are as follows: I received my J.D. from Loyola Law School in 2017. I received the First Honors Award in Legal Research and Writing, First Honors Award in Appellate Advocacy, and First Honors Award in Civil Litigation Practicum I for achieving the highest grade in those classes. During law school, I was a Staff Editor for Loyola Law Review. I was also an extern at the U.S. District Court, Central District of California, for the Honorable Christina A. Snyder, and a certified law clerk at the San Diego County District Attorney's Office, Collaborative Courts Division, and the Los Angeles County District Attorney's Office, Consumer Protection and Environmental Crimes Division. In 2016, I participated in Loyola Law School's Scott Moot Court Competition, where I placed Top 16 and was awarded the Top Ten Brief Award. In 2017, I participated in the Employment Rights Clinic, an extension of the Division of Labor Standards Enforcement created to investigate retaliation complaints. Upon graduation from law school, I was admitted to the California Bar in December 2017.

4. I am currently an associate at the law firm Diversity Law Group, P.C., an employment law firm that has handled numerous wage and hour class and individual actions, on both plaintiff and defense sides. The firm currently has cases in numerous state courts, including

1 the Santa Clara Superior Court, Los Angeles Superior Court, Orange County Superior Court, San
2 Diego County Superior Court, Monterey County Superior Court, as well as the United States
3 District Courts for the Central, Northern, Southern, and Eastern Districts of California.

4 5. I am currently handling and/or have handled numerous wage and hour class action
5 and PAGA lawsuits, including *Magadia v. Wal-Mart Associates, Inc., et al.* (Case Number 5:17-
6 cv-00062-LHK); *Garcia v. Wal-Mart Associates, Inc., et al.* (Case Number 3:18-cv-00500-L-
7 MDD); *Hernandez v. Wells Fargo Bank, N.A.* (Case Number 16CV299319); *Lao v. H & M*
8 *Hennes & Mauritz, L.P.* (Case Number 5:16-cv-333 EJD); *Arroyo v. Int'l Paper Company* (Case
9 Number 5:17-cv-06211-BLF); *Baker v. California Forensic Medical Group, Inc., et al.*, Judicial
10 Council Coordination Proceeding No. 4999 (Lead Case No. 17CV003723).

11 6. In 2018, I argued before the California Court of Appeal, Second Appellate
12 District, in the case of *Lee v. California Commerce Club, Inc.* (California Court of Appeal Case
13 Number B276171, LASC Case Number BC596924), and *Perez v. Standard Drywall, Inc.*
14 (California Court of Appeal Case Number A146819, Alameda Sup. Ct. No. RG15761142). In
15 that same year, I also assisted the firm in successfully obtaining class certification and partial
16 summary judgment by the United States District Court, Central District of California in the case
17 of *Magadia v. Wal-Mart Associates, Inc.* (Case Number 17-CV-00062-LHK). I third chaired the
18 bench trial in that same case in December 2018.

19 7. I have also been certified and/or approved as class counsel in numerous other
20 wage/hour class actions. Most recently, I was certified as class counsel in the cases *Garcia v.*
21 *Wal-Mart Associates, Inc., et al.* (Case Number 3:18-cv-00500-L-MDD), *Richert v. Samaritan,*
22 *LLC, et al.* (Case Number 17CV314186), *Song v. THC – Orange County, Inc.* (Case No. 8-17-
23 cv-965-JLS (DFM)), *Hernandez v. Wells Fargo Bank National Ass'n, et al* (Case No. 16-CV-
24 299319), and *Sims v. QG Printing II, LLC, et al.* (Case No. ED CV 20-1632-DMG (KKx)), as
25 part of the courts' orders granting class certification pursuant to Rule 23 of the FRCP and
26 California Code of Civil Procedure § 382.

27 8. Moreover, I was granted final approval as class counsel in *Lao v. H & M Hennes*
28 *& Mauritz, L.P.* (Case No. 5:16:cv-333 EJD), *Abarca v. El Estero Car Wash, Inc. et al* (Case No.

1 18CV003398), *Valles v. Community Hospital of the Monterey Peninsula* (Case No.
2 17CV003452), *Chavez v. Hugo Boss Retail, Inc.* (Case No. 18CV322644), *Hernandez v. Wells*
3 *Fargo Bank National Ass'n, et al* (Case No. 16-CV-299319); *Baker v. California Forensic*
4 *Medical Group, Inc., et al.*, Judicial Council Coordination Proceeding No. 4999 (Lead Case No.
5 17CV003723); *Mendez v. Falcon Trading Company* (Case No. 19CV004512); *Truong v. DS*
6 *Services of America, Inc.* (Case No. FCS054399).

7 9. I do not have any conflict of interest with the proposed cy pres recipient, Legal
8 Aid at Work.

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

11 Executed on this 16th day of August 2023, at Los Angeles, California.

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13 Kwanporn "Mai" Tulyathan
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