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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

JAVIER LOPEZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

CH ROBINSON COMPANY, INC.; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 30-2022-01259258-CU-OE-CXC

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

Date: July 09, 2026

Time: 2:00 PM

Dept.: CX102

Reservation No.: 74812680

Complaint Filed: May 12, 2022

Trial Date: None Set

1 I, Kwanporn “Mai” Tulyathan, declare as follows:

2 1. I am an attorney at law, duly licensed to practice before all courts in the State of
3 California and am a member of the law firm Diversity Law Group, P.C., one of the attorneys of
4 record for Plaintiff Javier Lopez (“Plaintiff”). I have personal knowledge of the matters set forth
5 herein, and if called upon as a witness to testify thereto, I could and would competently do so.

6 2. I am one of the primary attorneys on this matter. I strongly believe that Plaintiff
7 can prevail at trial. However, based on my own independent investigation and evaluation, I am
8 also of the opinion that settlement for the consideration and on the terms set forth in the Joint
9 Stipulation of Class and Representative Action Settlement is fair, reasonable, and adequate and is
10 in the best interests of the Class, in light of all known facts and circumstances and the expenses
11 and risks inherent in litigation.

12 3. My qualifications are as follows: I received my JD from Loyola Law School in
13 2017. I received the First Honors Award in Legal Research and Writing, First Honors Award in
14 Appellate Advocacy, and First Honors Award in Civil Litigation Practicum I for achieving the
15 highest grade in those classes. During law school, I was a Staff Editor for Loyola Law Review. I
16 was also an extern at the U.S. District Court, Central District of California, for the Honorable
17 Christina A. Snyder, and a certified law clerk at the San Diego County District Attorney’s
18 Office, Collaborative Courts Division, and the Los Angeles County District Attorney’s Office,
19 Consumer Protection and Environmental Crimes Division. In 2016, I participated in Loyola Law
20 School’s Scott Moot Court Competition, where I placed Top 16 and was awarded the Top
21 Ten Brief Award. In 2017, I participated in the Employment Rights Clinic, an extension of the
22 Division of Labor Standards Enforcement created to investigate retaliation complaints. Upon
23 graduation from law school, I was admitted to the California Bar in December 2017.

24 4. I am currently an associate at the law firm of Diversity Law Group, P.C., an
25 employment law firm that has handled numerous wage and hour class and individual actions, on
26 both plaintiff and defense sides. The firm currently has cases in numerous state courts, including
27 the Santa Clara Superior Court, Los Angeles Superior Court, Orange County Superior Court, San
28 Diego County Superior Court, Monterey County Superior Court, as well as the United States

District Courts for the Central, Northern, Southern, and Eastern Districts of California.

5. I am currently handling and/or have handled numerous wage and hour class action and PAGA lawsuits, including *Magadia v. Wal-Mart Associates, Inc., et al.* (Case Number 5:17-cv-00062-LHK); *Garcia v. Wal-Mart Associates, Inc., et al.* (Case Number 3:18-cv-00500-L-MDD); *Hernandez v. Wells Fargo Bank, N.A.* (Case Number 16CV299319); *Lao v. H & M Hennes & Mauritz, L.P.* (Case Number 5:16-cv-333 EJD); *Arroyo v. Int'l Paper Company* (Case Number 5:17-cv-06211-BLF); *Baker v. California Forensic Medical Group, Inc., et al.*, Judicial Council Coordination Proceeding No. 4999 (Lead Case No. 17CV003723); and *Garcia v. Apex Systems, LLC, et al.* (Case Number RG19014709).

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

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

8. Moreover, I was granted final approval as class counsel in *Lao v. H & M Hennes & Mauritz, L.P.* (Case No. 5:16-cv-333 EJD), *Abarca v. El Estero Car Wash, Inc. et al.* (Case No. 18CV003398), *Valles v. Community Hospital of the Monterey Peninsula* (Case No.

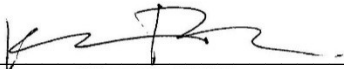
1 17CV003452), *Chavez v. Hugo Boss Retail, Inc.* (Case No. 18CV322644), *Hernandez v. Wells*
2 *Fargo Bank National Ass'n, et al.* (Case No. 16-CV-299319); *Baker v. California Forensic*
3 *Medical Group, Inc., et al.*, Judicial Council Coordination Proceeding No. 4999 (Lead Case No.
4 17CV003723);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

6 9. My co-counsel and I will adequately represent the Class Members in this action.
7 Class Counsel has and will zealously represent Plaintiff and the Class and pursue this lawsuit to
8 its conclusion. I have no conflicts with the Class and will adequately represent the Class.

9 10. I do not have a business relationship or financial interest in the *cy pres* recipient,
10 Legal Aid at Work.

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

13 Executed on this 27th day of March 2026, at Los Angeles, California.

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15 
16 Kwanporn "Mai" Tulyathan