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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

LAMEISHA GEORGE, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

WESTWAYS STAFFING SERVICES,
INC., a California corporation; and DOES
1 through 50, inclusive,

Defendants.

Case No.: CIVSB2212594
[Consolidated with: CIVSB2217699]

[Assigned for all purposes to the Hon. Jessica
Morgan, Dept. S-26]

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

Date: January 22, 2024
Time: 8:30 a.m.
Dept: S-26

Complaint Filed: June 16, 2022
Trial Date: None

1 **DECLARATION OF KWANPORN “MAI” TULYATHAN**

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

3 1. I am an attorney at law, duly admitted to practice before all courts in the State of
4 California, and am a member of the law firm of the Diversity Law Group, P.C., counsel of record
5 for Plaintiff Lameisha George (“Plaintiff”). I have personal knowledge of the facts set forth below
6 and if called to testify I could and would do so competently.

7 2. From the inception of the case, Class Counsel have zealously represented the
8 interests of the Class. Class Counsel have engaged in discovery as well as significant meet and
9 confer discussions with opposing counsel to obtain informal data and documents and to discuss the
10 merits of the claims on behalf of the Class. This settlement was obtained for the benefit of the
11 Class, as opposed to the individual Class Representative.

12 3. Based on my review of all the documents and information, and based on my
13 experience in class action litigation, I believe this settlement to be fair, adequate, and reasonable.

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

20 5. I am one of the primary attorneys on this matter. My qualifications are as follows: I
21 received my J.D. from Loyola Law School in 2017. I received the First Honors Award in Legal
22 Research and Writing, First Honors Award in Appellate Advocacy, and First Honors Award in
23 Civil Litigation Practicum I for achieving the highest grade in those classes. During law school, I
24 was a Staff Editor for Loyola Law Review. I was also an extern at the U.S. District Court, Central
25 District of California, for the Honorable Christina A. Snyder, and a certified law clerk at the San
26 Diego County District Attorney’s Office, Collaborative Courts Division, and the Los Angeles
27 County District Attorney’s Office, Consumer Protection and Environmental Crimes Division. In
28 2016, I participated in Loyola Law School’s Scott Moot Court Competition, where I placed Top 16

1 and was the awarded the Top Ten Brief Award. In 2017, I participated in the Employment Rights
2 Clinic, an extension of the Division of Labor Standards Enforcement created to investigate
3 retaliation complaints. Upon graduation from law school, I was admitted to the California Bar in
4 December 2017.

5 6. I am currently an associate at the law firm Diversity Law Group, P.C., an
6 employment law firm that has handled numerous wage and hour class and individual actions, on
7 both plaintiff and defense sides. The firm currently has cases in numerous state courts, including the
8 Santa Clara Superior Court, Los Angeles Superior Court, Orange County Superior Court, San
9 Diego County Superior Court, Monterey County Superior Court, as well as the United States
10 District Courts for the Central, Northern, Southern, and Eastern Districts of California.

11 7. I am currently handling and/or have handled numerous wage and hour class action
12 and PAGA lawsuits.

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

21 9. I have also been certified and/or approved as class counsel in numerous other
22 wage/hour class actions. Most recently, I was certified as class counsel in the cases *Garcia v. Wal-*
23 *Mart Associates, Inc., et al.* (S.D. Cal., Case Number 3:18-cv-00500-L-MDD), *Richert v.*
24 *Samaritan, LLC, et al.* (Santa Clara County Superior Court, Case Number 17CV314186), *Song v.*
25 *THC – Orange County, Inc.* (C.D. Cal., Case No. 8-17-cv-965-JLS (DFM)), *Hernandez v. Wells*
26 *Fargo Bank National Ass’n, et al* (Santa Clara County Superior Court, Case No. 16-CV-299319),
27 and *Sims v. QG Printing II, LLC, et al.* (C.D. Cal., Case No. ED CV 20-1632-DMG (KKx)), as part
28 of the courts’ orders granting class certification pursuant to Fed. R. Civ. P. 23 and California Code

1 of Civil Procedure § 382.

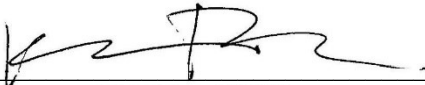
2 10. Moreover, I was granted final approval as class counsel in *Lao v. H & M Hennes &*
3 *Mauritz, L.P.* (N.D. Cal., Case No. 5:16:cv-333 EJD), *Abarca v. El Estero Car Wash, Inc. et al*
4 *(Monterey County Superior Court, Case No. 18CV003398)*, *Valles v. Community Hospital of the*
5 *Monterey Peninsula* (Monterey County Superior Court, Case No. 17CV003452), *Hernandez v.*
6 *Wells Fargo Bank National Ass’n, et al* (C.D. Cal., Case No. 16-CV-299319); *Baker v. California*
7 *Forensic Medical Group, Inc., et al.*, Judicial Council Coordination Proceeding No. 4999 (Lead
8 Case No. 17CV003723); *Mendez v. Falcon Trading Company* (Monterey County Superior Court,
9 Case No. 19CV004512).

10 11. I will adequately represent the Class Members in this action. Plaintiff’s counsel have
11 and will zealously represent Plaintiff and the Class and pursue this lawsuit to its conclusion. I have
12 no conflicts with the Class and will adequately represent the Class.

13 12. I have no conflicts of interest with the proposed cy pres recipient, Legal Aid at
14 Work.

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

17 Executed on this 29th day of November 2023, at Los Angeles, California.

18
19 
20 Kwanporn “Mai” Tulyathan