

Tyler J. Woods, Esq. (SBN 232464)
tyler.woods@wilshirelawfirm.com
James Yoo, Esq. (SBN 310680)
james.yoo@wilshirelawfirm.com
Heriberto Ponce, Esq. (SBN 339713)
eddie.ponce@wilshirelawfirm.com
Ruby Carrera, Esq. (SBN 343745)
ruby.carrera@wilshirelawfirm.com
Trenten Bilodeaux (SBN 332692)
trenten.bilodeaux@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
660 S. Figueroa Street, Sky Lobby
Los Angeles, California 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

LIAM ANDERSON, individually, and on behalf
of all others similarly situated,

Plaintiff,

vs.

TAIHEIYO CORPORATION, a California
corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 24STCV25277

*[Assigned for All Purposes to the Honorable
Timothy P. Dillon, Dept. 15]*

**DECLARATION OF LIAM ANDERSON
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Preliminary Approval Hearing:

Date: November 4, 2026

Time: 10:00 a.m.

Dept.: 15

Action Filed: September 30, 2024

DECLARATION OF LIAM ANDERSON

I, Liam Anderson, hereby declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of my Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for Taiheiyo Corporation (“Defendant”) as an hourly, non-exempt employee from approximately March 2024 to April 2024.

3. Based on my experience and knowledge of Defendant’s wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on my own behalf as well as on behalf of other hourly, non-exempt employees of Defendant.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to other hourly, non-exempt employees of Defendant. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other hourly, non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly, non-exempt employees at Defendant.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly, non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by Defendant’s company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by Defendant.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

7. Further, when I decided to become involved in this lawsuit as a class representative on behalf of other employees of Defendant and as a private attorney general for the State of California, I understood that I was not only seeking unpaid wages and penalties on behalf of myself, but also for other employees who worked for Defendant, and that by doing so, I would be delaying more immediate recovery available to me through the Labor Commissioner’s office.

1 8. I was also made aware that being a class representative and private attorney general
2 in an action filed on behalf of others would subject me to a stigma that is sometimes associated with
3 those who bring these kinds of lawsuits. I was aware that, as a class representative and private
4 attorney general, I might be responsible for some or all of Defendant's legal costs if the case was not
5 successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act
6 on behalf of the other employees and the State of California, but I was nervous about losing and
7 having a judgment filed against me for costs or losing job opportunities in the future.

8 9. I understood that there were risks involved in class and representative action lawsuits.
9 I understood that the lawsuit could continue for several years and require my services and attention
10 throughout the entire length of the lawsuit. I learned that even if we won at trial, the case could be
11 further delayed by appeals.

12 **Notoriety and Personal Difficulties Encountered**

13 10. As the named plaintiff, I am the face of the litigation. As of the date of this declaration,
14 the class notice will be mailed in this case to approximately 159 current and former employees of
15 Defendant, which will inform them that I filed class and representative actions against Defendant.
16 Exposing myself to this kind of publicity creates a risk for my future career prospects, since current
17 and former employees of Defendant may move to different companies within the industry or may
18 know people at other companies within the industry who may not wish to hire someone who sued
19 his employer. I also understand that having filed this lawsuit in court means that there is now a
20 permanent public record of this lawsuit available to the general public. Given this additional
21 exposure, there is further risk to my future career prospects.

22 **Amount of Time and Effort Spent and Duration of the Litigation**

23 11. I have always kept the best interests of the other hourly, non-exempt employees in
24 mind while performing my duties as the named plaintiff in this case. I have been committed
25 throughout the course of this case to vigorously prosecuting this case on behalf of myself and the
26 other employees. I believe that I have demonstrated my ability to advocate for the interests of the
27 other hourly non-exempt employees by initiating these lawsuits and have spent a substantial amount
28 of time and effort on this litigation. My work on this case has specifically included, among other

1 things, searching for and gathering my employment documents to provide to my attorneys, providing
2 information to my attorneys regarding my experiences working for Defendant, keeping in regular
3 contact with my attorneys regarding the status of the case, helping my attorneys prepare for
4 mediation, being on-call for my attorneys on the date of mediation in case questions or concerns
5 arose during mediation, and participating in settlement discussions. After mediation, I remained
6 actively involved by reviewing the settlement papers and contacting my counsel for updates. I
7 estimate that since I retained my counsel in August 2024, I have spent approximately 50 hours on
8 the activities described above. And I estimate that I will spend an additional 1-3 hours assisting my
9 attorneys through the approval process and staying up to date with the case through disbursement of
10 the settlement checks.

11 **Personal Benefit Received as a Result of the Litigation**

12 12. Absent the requested service payment, the personal benefit I will receive is the same
13 as all other employees. But unlike the other employees, who are only releasing the wage and hour
14 claims asserted in the lawsuit, I have signed a general release of claims as to Defendant.

15 13. I will continue to actively participate in this lawsuit as necessary and will continue to
16 make myself available to assist in this case moving forward as needed.

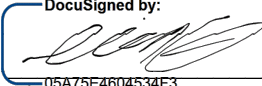
17 **No Conflicts**

18 1. I do not have any actual or potential conflicts of interest with Class Members or the
19 proposed Settlement Administrator, Phoenix Class Action Administrative Solutions.

20 2. I am not aware of any other pending matter or action asserting claims that will be
21 extinguished or adversely affected by this Settlement.

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

24 Executed on 9/9/2026, at Los Angeles, California.

25
26 DocuSigned by:

27 05A75E4604534F3...
Liam Anderson
28