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Attorneys for Plaintiffs
Cecilia Curry and Tina Chandra

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO – COMPLEX

**CVS HEALTH WAGE AND HOUR
CASES**

Case No. JCCP 5299

(Assigned to the Hon. Katherine A. Bacal, Dept.
C-63)

**DECLARATION OF DENNIS S. HYUN IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: April 10, 2026

Time: 1:30 p.m.

Dept.: C-63

Coordinated actions:

Chandra v. Longs Drug Stores California

SUPERIOR COURT OF CALIFORNIA,
COUNTY OF MONTEREY
NO. 23CV000219

Curry v. CVS Health, et al.

SUPERIOR COURT OF CALIFORNIA,
COUNTY OF SAN DIEGO
NO. 37-2022-00046692

1 I, Dennis S. Hyun, hereby declare and state as follows:

2 1. I am an attorney at law duly admitted to practice before all courts in the State of
3 California and am a shareholder of the law firm of Hyun Legal, APC, one of the attorneys of
4 record for Plaintiffs Cecilia Curry and Tina Chandra (together, "Plaintiffs"), in the above-entitled
5 action.

6 2. I have personal knowledge of the matters set forth herein, and if called upon as a
7 witness to testify thereto, I could and would competently do so.

8 3. I am one of the primary attorneys on this matter. My qualifications are as follows:
9 I received my Juris Doctor from Loyola Law School in 2002. I was named to the Dean's Honor
10 List from 2000-2002. During law school, I was a Senior Research Editor for Loyola International
11 & Comparative Law Review. I also was a research assistant for Professor Levenson, an extern at
12 the U.S. District Court for the Honorable Audrey B. Collins, and a clerk at the U.S. Attorney's
13 Office, Criminal Division. I also served as a summer law clerk at the white-collar criminal defense
14 firm, Lightfoot, Vandeveld, et al., which became part of Crowell & Moring LLP. Upon
15 graduation from law school, I served as a research attorney in the Los Angeles County Superior
16 Court for the Hon. J. Stephen Czuleger, the Hon. Owen Lee Kwong, the Hon. Laurie D. Zelon, and
17 the Hon. Joanne B. O'Donnell. After my clerkship ended, I practiced as a labor and employment
18 associate for the next 8 years, including most recently as a senior associate at Seyfarth Shaw LLP,
19 as well as DLA Piper LLP (US), and Morgan, Lewis & Bockius LLP.

20 4. My primary practice has been employment law throughout my entire private career.
21 I have handled a number of wage and hour matters including class actions and individual actions,
22 on behalf of plaintiffs and defendants. I have a practice that encompasses cases in the Orange
23 County Superior Courts, the Los Angeles County Superior Courts, the San Diego County Superior
24 Courts, the United States District Courts for the Southern, Central, Northern and Eastern Districts
25 of California, the California Court of Appeal, and the Ninth Circuit.

26 5. I have served as Class Defense Counsel in a number of wage and hour class actions,
27 including but not limited to: *Bradley v. Networkers Int'l, LLC*, 211 Cal. App. 4th 1129 (2012);
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1 *Chiu v. Citrix Systems, Inc.*, C.D. Cal. Case No. SACV11-01121 DOC (RNBx); *Hodge v. Aon*
2 *Insurance*, Los Angeles Super. Ct. Case No. BC 265725; *Hoyng v. Aon Insurance*, Los Angeles
3 Super. Ct. Case No. BC377184; *Jimenez v. Allstate Ins. Co.*, C.D. Cal. Case No. CV10-08486 JAK
4 (FFMx); *Marino v. BP West Coast Products*, Los Angeles Super. Ct. Case No. BC 357987;
5 *McEntee v. Ryland Homes*, Los Angeles Super. Ct. Case No. BC390868; *McKinstry v. Accenture*,
6 C.D. Cal. Case No. SACV11-1335 DOC (ANx); *Munoz v. Decron Properties*, Los Angeles Super.
7 Ct. Case No. BC387644; and *Rodriguez v. BP West Coast Products*, Los Angeles Super. Ct. Case
8 No. BC350736. As defense counsel, I have taken over 50 class member and
9 individual/representative plaintiff depositions. I have drafted class certification and decertification
10 papers, including in *Bradley*, which was initially affirmed by the Court of Appeal, but reversed
11 pursuant to *Brinker v. Superior Court*, 53 Cal. 4th 1003 (2012).

12 6. Currently, I am and/or was lead plaintiff's counsel in the following wage and hour
13 class or representative actions: *Asad v. Chevron Stations, Inc.*, Los Angeles Super. Ct. Case No.
14 BC470198; *Barrera v. Home Depot (USA), Inc.*, N.D. Cal. Case No.: C 12 5199 LHK (HRL);
15 *Bararsani v. Coldwell Banker*, Los Angeles Super. Ct. Case No. BC495767; *Barreras v. Michaels*
16 *Stores, Inc.*, N.D. Cal. Case No. C12-04474 PJH; *Brown v. CVS Pharmacy, Inc.*, C.D. Cal. Case
17 No. 2:15-cv-07631-PSG-PJW; *Chatman v. RMI Int'l, Inc.*, Los Angeles Super. Ct. Case No. BC
18 495755; *Chavez v. Converse, Inc.*, N.D. Cal. Case No. 15-cv-03746-NC; *Dynabursky v.*
19 *AlliedBarton, LLC, et al.*, C.D. Cal. Case No. 8:12-cv-02210-JLS-RNB; *Gonzales v. Wells Fargo*
20 *Bank, N.A.*, Los Angeles Super. Ct. Case No. BC502826; *Lao v. H&M Hennes & Mauritz*, N.D.
21 Cal. Case No. 5:16-cv-333 EJD; *Lee v. The Pep Boys Manny Moe & Jack of California*, Los
22 Angeles Super. Ct. Case No. BC496075; *Magadia v. Wal-Mart Assocs.*, N.D. Cal. Case No. 5:17-
23 cv-00062-LHK; *Naranjo v. Bank of America, N.A.*, N.D. Cal. Case No. C 14-02748 LHK;
24 *Ortegon-Ramirez v. Cedar Fair*, Santa Clara Super. Ct. Case No. 1-13-CV-254098; *Pace v.*
25 *PetSmart, Inc.*, C.D. Cal. Case No. SACV13-500 DOC; *Rodriguez v. NIKE Retail Services, Inc.*,
26 N.D. Cal. Case No. 5:14-CV-1508 BLF; *Stafford v. Brink's, Incorporated*, Case No. CV 14-01352
27 MWF (PLAx) and *Vass v. Gardner Trucking*, San Joaquin Super. Ct. Case No. 39-2013-294819-
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CU-OE-STK. Additionally, in *Chavez*, Case No. 15-cv-03746-NC, *Dynabursky* Case No. 8:12-cv-02210-JLS-RNB, *Pace*, Case No. SACV13-500 DOC, *Rodriguez*, Case No. 5:14-CV-1508 BLF, *Stafford*, Case No. 14-01352 MWF (PLAx), *Gonzales*, Los Angeles Super. Ct. Case No. BC502826, and *Magadia*, Case No. 5:17-cv-00062-LHK, I was certified as class counsel pursuant to the plaintiff's motion for class certification. Further, in *Stafford* and *Magadia*, we tried these certified class claims via bench trial and prevailed. In *Magadia*, we obtained a \$102 million judgment for the class against Walmart, which was reversed on appeal by the Ninth Circuit. Moreover, I have been approved as class counsel in connection with numerous class settlements.

7. Based on my own independent investigation and evaluation, I am of opinion that settlement for the consideration and on the terms set forth in the Joint Stipulation of Class and Representative Action Settlement ("Settlement Agreement") are fair, reasonable, and adequate and is in the best interests of the Class in light of all known facts and circumstances and the expenses and risks inherent in litigation.

8. I strongly believe that Plaintiffs can prevail at trial. However, I also believe in the fairness of the settlement, which is based on factoring in the uncertainty and risks to Plaintiffs involved in not prevailing on one or more of the causes of action or theories alleged in the operative Complaint and in the possibility of appeals.

9. After taking into account sharply disputed factual and legal issues involved in this litigation, the risks attending further prosecution, and the substantial benefits to be received pursuant to the compromise and settlement of the litigation, I believe this settlement to be fair, adequate, and reasonable.

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10. My co-counsel and I will adequately represent the Class in this action. Plaintiffs' counsel have and will zealously represent Plaintiffs and the Class and pursue this lawsuit to its conclusion. I have no conflicts with the Class and will adequately represent the Class.

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

Executed on March 18, 2026, at Los Angeles, California.


Dennis S. Hyun