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6 Attorneys for Defendant
SEA POINTE CONSTRUCTION, INC.
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF ORANGE
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11 LUKE KOEHLER, on behalf of himself and
other aggrieved employees,

12 Plaintiffs,

13 v.
14

15 SEA POINTE CONSTRUCTION AND
DEVELOPMENT, INC., a California
corporation; and DOES 1 through 100,
16 inclusive,

17 Defendants.
18

Case No. 30-2022-01297787-CU-OE-CXC

**DECLARATION OF ANDREW H.
WOO IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF
PRIVATE ATTORNEYS GENERAL
ACT SETTLEMENT AGREEMENT**

ASSIGNED FOR ALL PURPOSES TO
JUDGE MELISSA R. McCORMICK

Trial Date: TBD
Complaint Filed: December 19, 2022

DECLARATION OF ANDREW H. WOO

19 I, ANDREW H. WOO, declare as follows:

20 1. I am an attorney duly admitted to practice before the courts of the State of
21 California. I am an attorney with the law firm Littler Mendelson, P.C., attorneys of record in the
22 above-titled action for Defendant SEA POINTE CONSTRUCTION AND DEVELOPMENT,
23 INC. ("Defendant"). I am familiar with the documents and pleadings on file in this action and
24 have personal knowledge of the facts stated herein. Further, if called and sworn as a witness, I
25 could and would competently testify thereto.

26 2. The settlement agreement in the above-captioned matter provides that any
27 uncashed funds will be distributed to Bet Tzedek Legal Services.
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1 3. Neither Defendant nor its counsel have any interest in the cy pres recipient,
2 including in its governance.

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

5 Executed this 5th day of June, 2024 at Fresno, California.

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8 ANDREW H. WOO

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10 4880-9555-1430.1 / 068695-1002