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(Additional Counsel listed on next page)

[Additional counsel listed on next page]

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

LEEA STEVIE PALMA, as a proxy for the
State of California,

Plaintiffs,

vs.

HAT WORLD, INC., a Corporation; and
DOES 1 through 100, inclusive,

Defendants.

Case No. CIVSB 2317027

[Assigned to the Honorable David E.
Driscoll in Dept. S22]

**DECLARATION OF EDWARD W.
CHOI IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT**

Date: January 6, 2026

Time: 8:30 a.m.

Dept.: S22

ADDITIONAL ATTORNEYS

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Attorneys for Plaintiff TAKORI JULIANA COLEMAN,
on behalf of herself and others similarly situated

1 I, Edward W. Choi, declare as follows:

2 1. I am an individual over the age of 18. I am one of the attorneys of record for
3 Plaintiff Leea Stevie Palma (hereinafter referred to as "Plaintiff"). I have personal knowledge
4 of the facts set forth below and if called to testify I could and would do so competently.

5 2. As previously noted in the application for Preliminary Approval, this current
6 settlement was negotiated at arm's length and resulted only after a failed mediation attempt and
7 further litigation and negotiations.

8 3. Prior to engaging in private mediation, my co-counsel and I engaged in extensive
9 factual investigation before settling, including reviewing class data and analyzing the same
10 through an expert witness.

11 4. Although Plaintiffs and their counsel are confident that litigation of the claims
12 would result in a representative judgment against Defendant, they recognize the inherent risks in
13 litigation, including the specific risks that class certification could be denied, liability could not
14 be established at trial, or the applicable law could change.

15 5. After taking into account sharply disputed factual and legal issues involved in
16 this litigation, the risks attending further prosecution, and the substantial benefits to be received
17 pursuant to the compromise and settlement of the litigation, I believe that settlement on the
18 terms hereinafter set forth is appropriate and in the best interests of the Parties and that this
19 settlement is fair and reasonable.

20 **ATTORNEY QUALIFICATIONS, FEES AND COSTS**

21 6. I am one of the primary attorneys on this matter. My qualifications are as
22 follows: I received my *Juris Doctorate* degree from UCLA Law School in 2000. Upon
23 graduation, I joined the law firm of Lee & Associates in Los Angeles, California as an associate.
24 I started my own practice in October 2004.

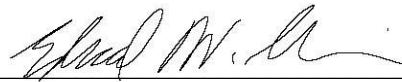
25 7. During the course of my practice, I have primarily represented consumers and
26 obtained millions of dollars in recovery for my clients. I have handled numerous wage and hour
27 cases during my career. Since 2009, I have been certified as class counsel and granted final
28 approval in numerous wage and hour cases including, but not limited to, *Choi, et al. v. Midway*

1 *International Inc.*, et al. LASC Case No. BC394495; *Garcia, et al. v. RGIS, LLC, et al.* LASC
2 Case No. BC 425624; *Cabrera v. Frazee, et al.* LASC Case No. BC 440309; *Vo, et al. v. The*
3 *Party Staff, et al.* OCSC Case No. 30-2011-00444836-CU-OE-CXC; *Oh, et al. v. Best Coach*
4 *Technologies, Inc., et al.* LASC Case No. BC 462848; *Rawley v. Freedom Mortgage, Inc.*
5 Orange County Superior Court Case No. 30-2014-00724164-CU-OE-CXC; *Castro v.*
6 *Continental Airlines*, USDC Central District Case No. 2:14-CV-00169-SVW-AGR; *Barreras v.*
7 *Michaels Stores, Inc.* USDC – Northern District Case No. C12-04474 PJH, *Dynabursky v.*
8 *AlliedBarton Security Services, LP, et al.*, SACV 12-02210 JST (RNBx), *Brown v. CVS*
9 *Caremark, et al.* United States District Court, Central District, Case No.: 2:15-cv-07631-JFW-
10 PJW; *Castillo v. Sheraton Operating Corporation*, USDC, Central District of California Case
11 No. 2:17-cv-07091-FMO-AS; *Zepeda v. Ulta Salon, Cosmetics & Fragrance, Inc.* USDC,
12 Eastern District of CA, Case No. 1:18-cv-00750-DAD; *Audycki v. Stanford Health Care, Inc.*
13 Santa Clara Superior Court, Case No. 19CV347173 and *Medina v. United Airlines, Inc.* Los
14 Angeles Superior Court, Case No. BC 624742.

15 8. I am seeking reimbursement of \$4,364.48 for filing fees, attorney service fees,
16 and anticipate costs to finalize this matter. Attached hereto as Exhibit A is my firm's cost sheet.

17 9. Concurrently with filing this Declaration, I provided notice to the LWDA of this
18 Motion. Attached hereto as Exhibit B is the filing confirmation.

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20 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
21 December 11, 2025, at Los Angeles, California.

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24 Edward W. Choi
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EXHIBIT A

Client Trust Liability:Palma v. Hat World

Date	Payee	Memo	Amount
	Ace Executive		
12/08/2022	Services	S&C	\$ 1,668.35
05/09/2023	One Legal	Service of process	\$ 65.89
05/10/2023	One Legal	Service of process	\$ 57.65
09/21/2023	One Legal	Notice	\$ 74.12
10/16/2023	One Legal	Notice	\$ 15.96
11/03/2023	One Legal	S&C PAGA Case	\$ 1,551.46
		Opposition to Motion to Compel	
11/27/2023	Federal Express	Arb (Courtesy Copy)	\$ 22.47
02/12/2024	Court Call	Trial Setting Conference	\$ 72.00
06/19/2024	One Legal	Stip & Order	\$ 12.31
10/23/2024	One Legal	Stip to Continue	\$ 41.30
11/04/2024	Court Call	CMC PAGA Case	\$ 72.00
11/07/2024	One Legal		\$ 12.35
11/07/2024	One Legal	Stip & Order	\$ 12.35
03/04/2025	One Legal	Stipulation	\$ 14.00
04/25/2025	CA Efile	Stip for Leave to file FAC	\$ 20.00
04/25/2025	CA Efile		\$ 5.64
06/02/2025	CA Efile	Motion for Prelim	\$ 60.00
06/02/2025	CA Efile		\$ 6.74
06/04/2025	CA Efile	Stip to Dismiss	\$ 20.00
06/04/2025	CA Efile	Stip to Dismiss CA	\$ 5.64
06/10/2025	CA Efile	FAC	\$ 5.95
06/12/2025	CA Efile	Joint Status Report	\$ 5.95
07/02/2025	Court Call		\$ 72.00
07/28/2025	Court Call	Prelim	\$ 72.00
	San Bernardino		
08/01/2025	Superior Court	Download Order Granting Prelim	\$ 3.66
08/01/2025	CA Efile	Notice of Entry of Order	\$ 5.95
12/11/2025	CA Efile	Motion for Final Approval	\$ 60.00
12/11/2025	CA Efile	Motion for Final Approval	\$ 6.74
12/11/2025	Court Call	Final Approval	\$ 72.00
	Anticipated Costs to Finalize		\$ 250.00
	Total		\$ 4,364.48

EXHIBIT B