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Attorneys for Defendant
HARKINS ADMINISTRATIVE SERVICES, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

SARAI CORADO, an individual; on behalf of
herself and all others similarly situated and the
general public,

Plaintiffs,

vs.

Harkins Administrative Services, Inc., a
corporation; and DOES 1 to 100, inclusive,

Defendants.

Case No. CVRI2302159

**DECLARATION OF EVELYN WANG IN
SUPPORT OF PLAINTIFF'S UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Assigned to the Hon. Harold W. Hopp
Dept.: 1

Date: December 3, 2024
Time: 8:30 a.m.

DECLARATION OF EVELYN WANG

I, Evelyn Wang, declare as follows:

1. I am an attorney at law licensed to practice in all state courts in the State of California and am a Partner with the law firm Davis Wright Tremaine LLP, counsel of record for Defendant Harkins Administrative Services, Inc. ("Defendant") in the above-captioned matter. All of the facts set forth below are true of my own knowledge, and if called upon as a witness, I could and would testify as to each of them under oath.

2. I am submitting this declaration in support of Plaintiff Sarai Corado's ("Plaintiff") Motion for Preliminary Approval of Class Action and PAGA Settlement (the "Motion"), as required by the Court's Class Action Case Management Order #1 paragraph G(3)(b).

3. I am familiar with the terms of the settlement in this action, including the scope of the class definition and class period and the nature of the claims released. Final Judgment was entered on January 21, 2021, in the matter entitled *Adan Garcia v. Harkins Administrative Services, Inc.*, United States District Court, Central District of California, Case No. 5:18-cv-2314 MCS (JEMx), granting final approval of a class action settlement covering all current or former non-exempt employees employed by Harkins Administrative Services, Inc. in California and who worked in California as a non-exempt employee for Harkins Administrative Services, Inc. at any time during the period of September 20, 2014 through June 4, 2020. While the *Adan Garcia v. Harkins Administrative Services, Inc.* class action settlement covers claims similar to those asserted in this action and a settlement class including some members who are also members of the class defined in this action, the settlement period here begins on June 5, 2020, and thus does not overlap with the class action settlement in *Adan Garcia v. Harkins Administrative Services, Inc.*

4. I directed a research librarian at my firm to conduct a search of all California state and federal court filings alleging Labor Code claims against Defendant within the past 4 years. I reviewed the results of that report and, based on my review, other than the matter described in the prior paragraph, there is no other lawsuit that asserts claims similar to those asserted in this action

1 on behalf of a class or group of individuals, some or all of whom would also be members of the
2 class defined in this action.

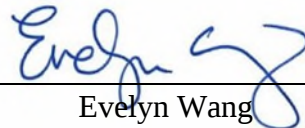
3 5. I also inquired with in-house counsel for Harkins Administrative Services, Inc. In-
4 house counsel confirmed that, other than the matter described above in Paragraph 3, he is not
5 aware of any other lawsuit that asserts claims similar to those asserted in this action on behalf of a
6 class or group of individuals, some or all of whom would also be members of the class defined in
7 this action.

8 6. I also utilized the online search function to conduct a search of filings submitted to
9 the Labor and Workforce Development Agency pursuant to the Private Attorneys General Act
10 (available at <https://cadir.my.salesforce-sites.com/PagaSearch/>). Based on my search using the
11 LWDA's online search function on October 28, 2024, there are no other filings other than the
12 filings related to the instant matter and the *Adan Garcia v. Harkins Administrative Services, Inc.*
13 case described above.

14 7. On information and belief, Defendant does not have any financial interest in, or
15 otherwise have a relationship with, Phoenix Class Action Administration Solutions, the mutually-
16 agreed upon Settlement Administrator proposed for the instant matter.

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

19 Executed this 28th day of October, 2024.

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21 
22 Evelyn Wang