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LIZ ADRIANA MARTINEZ CHAVEZ, and all other similarly situated persons

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN BERNARDINO

SYNTHIA CASTILLO GARCIA, on
behalf of herself and all others similarly
situated,

Plaintiff,

v.

KALAVERAS RC INC, a California
corporation, and DOES 1-20, inclusive,

Defendants.

Case No. CIVSB2315395

Assigned for All Purposes to:
The Hon. Christian Towns
Dept.: S-26

**DECLARATION OF YOONIS HAN IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: January 27, 2026
Time: 8:30 a.m.
Dept.: S-26

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I, YOONIS HAN, Declare:

1. I am an attorney at law licensed to practice before this Court. I am a partner at Law Group, APC, counsel of record for plaintiffs Synthia Castillo Garcia and Liz Adriana Chavez (collectively, "Plaintiffs"), in this matter. I have personal knowledge of all of the facts set forth herein. If called as a witness, I could and would competently testify thereto.

2. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval of the Proposed Settlement. I have personal knowledge of the facts stated in this declaration and I can testify competently to them if called upon to do so.

QUALIFICATIONS AS COUNSEL

3. I am a 2007 graduate of Loyola Law School, Los Angeles. Since graduating from school, my practice has consisted primarily of employment law litigation. In 2008, I began working as an associate attorney at a law office, in Los Angeles, working mostly on employment and business litigation matters, including individual and class action matters. I was often the associate staffed on such cases. In particular, I received a wide-array of wage and hour cases and performed the following types of tasks: drafting complaints, drafting and arguing motions to demurrers and motions to strike, drafting and responding to written discovery; opposing and arguing discovery related motions; interviewing putative class members; conducting mediation briefs; and conducting exposure analyses to assess the strengths and weaknesses of asserted claims, the likelihood of prevailing at class certification and potential damages resulting from such claims. As an associate attorney, I second-chaired a business case, bench trial in Los Angeles Superior Court, and obtained a favorable verdict for my

4. In approximately January 2010, I voluntarily resigned from the law office in Los Angeles, and in March 2010, I accepted an associate attorney position with the boutique law firm of Larson Arshonsky & Kurtz, LLP (“LA&K”), in Sherman Oaks. During my employment at LA&K, I worked exclusively on the defense of employment law matters, including individual

1 claims under the California's Fair Employment and Housing Act, single and multi-plaintiff wage
2 and hour matters, and class action wage and hour cases. I played a significant role in the class
3 action cases that I was worked on, as I was often the only associate staffed on such cases. In
4 addition to the same job duties described in the immediately preceding paragraph herein, I also
5 performed the following tasks: advising employers on compliance with California and federal
6 employment laws; interviewing putative class members; drafting and obtaining declarations and
7 individual settlement agreements/releases from putative class members; reviewing and editing
8 class action settlement agreements; reviewing and editing motions for preliminary and final
9 approval prepared by plaintiffs' attorneys; and serving as the primary contact to in-house counsel.
10 In short, I played an integral role in all aspects of litigation from the inception of a matter through
11 settlement/class certification. As an associate at LA&K, I second-chaired two employment law
12 arbitrations and obtained a favorable defense verdict for my clients on both matters.
13 Additionally, I spent a significant amount of time working on trial preparation on numerous
14 employment matters.

15 5. In approximately March 2015, I voluntarily resigned from LA&K to accept an in-
16 house/general counsel position with a restaurant management company, which managed
17 approximately 1,200 restaurant employees at 6 different restaurant locations, throughout
18 California. As General Counsel, I was entrusted with managing both the Legal and Human
19 Resources departments, on behalf of the 6 different restaurants, and reported directly to the
20 President/CEO and CFO of the company. As General Counsel, I was responsible for litigating
21 various individual and class action wage and hour matters in-house, which involved all of the
22 above-mentioned litigation tasks; and overseeing and communicating with any outside counsel
23 to manage the additional class action matters that were handled by the outside insurance defense
24 firms. With respect to the class action wage and hour matters, in addition to the above-described
25 tasks, I also played a significant role in conducting extensive damages analysis in-house, and
26 leading settlement negotiations and representing the company at mediations.

27 6. In February 2016, I voluntarily resigned from the in-house counsel position and
28 transitioned into litigating employment law matters exclusively from the plaintiff's side. Since

February 2016, I have been a partner and 50% shareholder of Verum Law Group, APC. I believe that my employment defense and in-house background is extremely useful in my current wage and hour class action, and employment law practice, as it allows me to serve as a better plaintiff's-side attorney, being able to assess, understand and see the case from the defense and business perspectives as well.

7. Currently, over sixty percent (60%) of our practice is dedicated to the prosecution of wage and hour class action cases, filed in both State and Federal courts throughout California. My office and I have been appointed as class counsel in numerous cases, including but not limited to:

- a. *Morin et al. v. Dealer's Choice Truckaway System, Inc. dba Truckmovers*, United States District Court, Central District, before the Honorable Wesley L. Hsu, Case No. 2:23-cv-00216-WLH-SK.
- b. *Castillo v. Selig Parking, Inc.*, Case No. 20STCV21009, California Superior Court, Los Angeles, before the Honorable Elaine Lu.
- c. *Covarrubias v. John Griffin Construction, Inc.*, Case No. CVRI2301734, California Superior Court, Riverside, before the Honorable Harold W. Hopp.
- d. *Medina v. Royal Terrace Healthcare, LLC*, Case No. 20STCV31467, California Superior Court, Los Angeles, before the Honorable William F. Highberger.
- e. *Schmieder v. Removery, LLC*, Case No. 23STCV03923, California Superior Court, Los Angeles, before the Honorable Samantha Jessner.
- f. *Sampson v. GJ Gentry, et al.*, Case No. CIVDS1926604, California Superior Court, San Bernardino, before the Honorable Christian Towns.
- g. *Ramirez v. Benevolence*, Case No. 22STCV02782, California Superior Court, Los Angeles, before the Honorable William F. Highberger.
- h. *Alvarez v. Marine Fenders International, Inc.*, Case No. 21STCV22601, California Superior Court, Los Angeles, before the Honorable Elihu M. Berle.
- i. *Towell et al. v. O'Gara Coach Company, LLC*, Case No. 19STCV45961, California Superior Court, Los Angeles, before the Honorable William F.

Highberger.

- j. *Hernandez et al. v. Christensen Brothers General Engineering, Inc. et al.*, Case No. 5:22-cv-00836 AB (SP), United States District Court – Central District of California before the Hon. André Birotte Jr.
- k. *Huizar v. National Metal Stampings, Inc.*, Case No. 22STCV14679, California Superior Court, Los Angeles, before the Honorable Maren Nelson.
- l. *Tagle v. Brek Manufacturing Co.*, Case No. 20STCV45011, California Superior Court, Los Angeles County, before the Honorable Elihu M. Berle.
- m. *Merrick et al., v. Nippon Express NEC Logistics America, Inc. et al.*, Case No. BC651044, California Superior Court, Los Angeles County, before the Honorable Lawrence P. Riff.
- n. *Guerrero v. United States Gypsum Company*, Case No. 3:21:cv-01502-RBM-JLB, United States District Court, Southern District of California, before the Honorable Ruth Bermudez Montenegro.
- o. *McNair et al., v. Impac Mortgage Corp. dba Cashcall Mortgage*, Case No. 30-2018-01019235-CU-OE-CXC, California Superior Court, County of Orange, before the Honorable William D. Claster.
- p. *Covarrubias et al. v. Boudreau Pipeline Corporation*, Case No. RIC1614016, California Superior Court, County of Riverside, before the Honorable Craig G. Riemer.
- q. *Goodwin et al. v. CSI, at PH, LLC et al*, Case No. 30-2016-00844674-CU-OE-CXC, California Superior Court, County of Orange, before the Honorable Randall J. Sherman.
- r. *Rodriguez v. Guadalupe R. Medina et al.*, Case No. CIVDS1602243, California Superior Court, County of San Bernardino, before the Honorable David Cohn.
- s. *Luna v. Vernon Security, Inc.*, Case No. BC612855, California Superior Court, County of Los Angeles, before the Honorable John Shepard Wiley, Jr.
- t. *Kim v. Manna Y&K One, Inc.*, Case No. 37-2017-00024051-CU-OE-CTL,

1 California Superior Court, County of San Diego, before the Honorable Gregory
2 Pollack.

3 u. *Torres, et al. v. Utility Tree Service, Inc.*, Lead Case No. 2015-1-CV-286314
4 (JCCP-5035), California Superior Court, County of Santa Clara, before the
5 Honorable Patricia M. Lucas.

6 v. *Jimenez v. Pacific Die Casting*, Case No. BC687401, California Superior Court,
7 County of Los Angeles, before the Honorable Amy D. Hogue.

8 w. *Saldivar v. W.A. Thompson Distributing Co. of Mojave*, Case No. 19STCV41168,
9 California Superior Court, County of Los Angeles, before the Honorable Elihu M.
10 Berle.

11 x. *Duran v. Oz Moving & Storage California, Inc., et al.*, Case No. 18STCV01144,
12 California Superior Court, County of Los Angeles, before the Honorable Ann I.
13 Jones.

14 y. *Aguas v. Mamco, Inc.*, Case No. RIC1902499, California Superior Court, County
15 of Riverside, before the Honorable Sunshine S. Sykes.

16 z. *Quintero v. Hillsides*, Case No. BC694019, California Superior Court, County of
17 Los Angeles, before the Honorable David S. Cunningham.

18 aa. *Covarrubias et al. v. Boudreau Pipeline Corporation*, Case No. RIC1614016,
19 California Superior Court, County of Riverside, before the Honorable Craig G.
20 Riemer.

21 bb. *Luna v. Vernon Security, Inc.*, Case No. BC612855, California Superior Court,
22 County of Los Angeles, before the Honorable John Shepard Wiley Jr.

23 cc. *Jackson et al, v. SPS Technologies, LLC, et al.*, Case No. 2:15-cv-09854-AB
24 (JCx), the United States District Court – Central District of California, before the
25 Honorable Andre Birotte, Jr.

26 8. Neither Plaintiffs nor our firm has any known conflicts of interest with any
27 putative class members.

28 9. Based upon the analysis and conclusions of Plaintiffs' counsel in this matter, their

1 experts, review of Defendants provided documents and records, and frank, candid discussions
2 with an experienced mediator, Plaintiffs and our office assess the value of the proposed
3 settlement as reasonable.

4 I declare under the penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct. Executed on September 10, 2025, at Mar Vista, California.

6 /s/ Yoonis Han

7 Yoonis Han
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