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Attorneys for Plaintiff Fazon Williams and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CHRIS MOORER, individually, and on
behalf of other members of the general public
similarly situated; FAZON WILLIAMS,
individually, and on behalf of other members
of the general public similarly situated and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiffs,

vs.

PROVANTAGE CORPORATE
SOLUTIONS, LLC, an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

Case No. 21STCV24842

Related to Case No. 23STCV13610

[Hon. Carolyn B. Kuhl, Department 12]

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

Date: February 25, 2025
Time: 10:30 a.m.
Department: 12

Complaint Filed: July 7, 2021
FAC Filed: November 4, 2024

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 Fazon Williams (hereinafter referred to as “Plaintiff”). I have personal knowledge of
4 the facts set forth below and if called to testify I could and would do so competently.

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

9 3. During the course of my practice, I have primarily represented consumers and
10 employees. I have handled numerous wage and hour cases during my career and have been
11 certified as class counsel and granted final approval in numerous cases, including, but not
12 limited to, *Choi, et al. v. Midway International Inc., et al.* Los Angeles Superior Court
13 (“LASC”) Case No. BC394495; *Lee v. The Men’s Wearhouse, Inc., et al.* Alameda Superior
14 Court Case No. RG09461973; *Garcia, et al. v. RGIS, LLC, et al.* LASC Case No. BC 425624;
15 *Choi v. Mazda, et al.* LASC Case No. BC 391638; *Cabrera v. Frazee, et al.* LASC Case No. BC
16 440309; *Vo, et al. v. The Party Staff, et al.* OCSC Case No. 30-2011-00444836-CU-OE-CXC;
17 *Oh, et al. v. Best Coach Technologies, Inc., et al.* LASC Case No. BC 462848; *Rawley v.*
18 *Freedom Mortgage, Inc.* Orange County Superior Court Case No. 30-2014-00724164-CU-OE-
19 CXC; *Mendez v. Stevenson Restaurant, Inc.* LASC Case No. BC536766; *Castro v. Continental*
20 *Airlines, Inc.* United States District Court, Case No. 2:14-cv-00169-SVW-AGR; *Barreras v.*
21 *Michaels Stores, Inc.* USDC – Northern District Case No. C12-04474 PJH; *Kim v. Kabuki,*
22 LASC Case No. BC511049; *Dynabursky v. AlliedBarton Security Services, LP, et al.,* SACV
23 12-02210 JST (RNBx); *Avilez v. Pinkerton Government Services,* United States District Court,
24 Case No. SACV 11-0493-DOC (JCGx); *Brown v. CVS Caremark, et al.* United States District
25 Court, Central District, Case No.: 2:15-cv-07631-JFW-PJW; *Wu v. General Nutrition Orange*
26 *County Superior Court* Case No. 30-2012-00593759-CU-OE-CXC; *Hernandez v. Pei Wei Asian*
27 *Diner, LLC,* United States District Court, Case No.: 8:17-cv-00679 JLS (JCGx); 8:17-cv-00679
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1 JLS (JCGx); *Son v. Phillips Steel*, Los Angeles Superior Court, Case No. BC 675988 and *Song*
2 *v. THC – Orange County, Inc.* United States District Court, Case No. 8:17-cv-00965-JLS-DFM.

3 4. The Parties recognize the risk, expense, and delay in continuing litigation with
4 the class and PAGA claims, and believe the settlement to be fair, reasonable, and adequate.
5 Each side has apprised the other of their respective factual contentions, legal theories and
6 defenses, resulting in negotiations taking place between the Parties. Although Plaintiff believes
7 that the class can be certified, Plaintiff also believes in the fairness of the settlement that is
8 based on factoring in the uncertainty and risks to Plaintiff involved in not prevailing on one or
9 more of the causes of action or theories alleged in the operative Complaint, the possibility of
10 non-certification, and the potential for appeals.
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12 5. My only relationship with Plaintiff is the attorney-client relationship in this
13 matter.

14 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
15 December 4, 2024, at Los Angeles, California.

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