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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 DENNIS S. HYUN IN
SUPPORT OF PLAINTIFF'S 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, DENNIS S. HYUN, hereby declare and state as follows:

2 1. I have personal knowledge of the facts contained in this declaration, and if called as a
3 witness, could and would testify as to their accuracy.

4 2. I am an attorney admitted to practice in the State of California and I am a shareholder in
5 Hyun Legal, APC. I am one of the lawyers responsible for representing Plaintiff Fazon Williams
6 (“Plaintiff”) in the above-captioned matter.

7 3. I am one of the primary attorneys on this matter. My qualifications are as follows: I
8 received my JD from Loyola Law School in 2002. I was named to the Dean’s Honor List from 2000-
9 2002. During law school, I was a Senior Research Editor for Loyola International & Comparative Law
10 Review. I was also a research assistant for Professor Levenson, an extern at the U.S. District Court for
11 the Honorable Audrey B. Collins, and a clerk at the U.S. Attorney’s Office, Criminal Division. I also
12 served as a summer law clerk at the white-collar criminal defense firm, Lightfoot, Vandavelde, *et al.*,
13 which became part of Crowell & Moring LLP. Upon graduation from law school, I served as a research
14 attorney in the Los Angeles County Superior Court for the Hon. J. Stephen Czuleger, the Hon. Owen
15 Lee Kwong, the Hon. Laurie D. Zelon, and the Hon. Joanne B. O’Donnell. After my clerkship ended, I
16 practiced as a labor and employment associate for the next 8 years, including most recently as a senior
17 associate at Seyfarth Shaw LLP, as well as DLA Piper LLP (US), and Morgan, Lewis & Bockius LLP. I
18 am currently a shareholder in the law firm Hyun Legal, APC.

19 4. My primary practice has been employment law throughout my entire private career. I
20 have handled a number of wage and hour matters including class actions and individual actions, on
21 behalf of plaintiffs and defendants. I have a practice that encompasses cases in the Orange County
22 Superior Courts, the Los Angeles County Superior Courts, the San Diego County Superior Courts, the
23 United States District Courts for the Southern, Central, Northern and Eastern Districts of California, the
24 California Court of Appeal, and the Ninth Circuit.

25 5. I have served as Class Defense Counsel in a number of wage and hour class actions,
26 including but not limited to: *Bradley v. Networkers Int’l, LLC*, 211 Cal. App. 4th 1129 (2012); *Chiu v.*
27 *Citrix Systems, Inc.*, C.D. Cal. Case No. SACV11-01121 DOC (RNBx); *Hodge v. Aon Insurance*, Los
28 Angeles Sup. Ct. Case No. BC 265725; *Hoyng v. Aon Insurance*, Los Angeles Sup. Ct. Case No. BC
377184; *Jimenez v. Allstate Ins. Co.*, C.D. Cal. Case No. CV10-08486 JAK (FFMx); *Marino v. BP West*

1 *Coast Products*, Los Angeles Sup. Ct. Case No. BC 357987; *McEntee v. Ryland Homes*, Los Angeles
2 Sup. Ct. Case No. BC 390868; *McKinstry v. Accenture*, C.D. Cal. Case No. SACV11-1335 DOC (ANx);
3 *Munoz v. Decron Properties*, Los Angeles Sup. Ct. Case No. BC387644; and *Rodriguez v. BP West*
4 *Coast Products*, Los Angeles Sup. Ct. Case No. BC 350736. As defense counsel, I have taken over 50
5 class member and individual/representative plaintiff depositions. I have drafted class certification and
6 decertification papers, including in *Bradley*, which was initially affirmed by the Court of Appeal, but
7 reversed pursuant to *Brinker v. Superior Court*, 53 Cal. 4th 1003 (2012).

8 6. Currently, I am and/or was lead plaintiff's counsel in the following wage and hour class
9 or representative actions: *Asad v. Chevron Stations, Inc.*, Los Angeles Sup. Ct. Case No. BC470198;
10 *Barrera v. Home Depot (USA), Inc.*, N.D. Cal. Case No.: C 12 5199 LHK (HRL); *Bararsani v. Coldwell*
11 *Banker*, Los Angeles Sup. Ct. Case No. BC495767; *Barreras v. Michaels Stores, Inc.*, N.D. Cal. Case
12 No. C12-04474 PJH; *Brown v. CVS Pharmacy, Inc.*, C.D. Cal. Case No. 2:15-cv-07631-PSG-PJW;
13 *Chatman v. RMI Int'l, Inc.*, Los Angeles Sup. Ct. Case No. BC 495755; *Chavez v. Converse, Inc.*, N.D.
14 Cal. Case No. 15-cv-03746-NC; *Dynabursky v. AlliedBarton, LLC, et al.*, C.D. Cal. Case No. 8:12-cv-
15 02210-JLS-RNB; *Gonzales v. Wells Fargo Bank, N.A.*, Los Angeles Sup. Ct. Case No. BC502826; *Lao*
16 *v. H&M Hennes & Mauritz*, N.D. Cal. Case No. 5:16-cv-333 EJD; *Lee v. The Pep Boys Manny Moe &*
17 *Jack of California*, Los Angeles Sup. Ct. Case No. BC 496075; *Magadia v. Wal-Mart Assocs.*, N.D. Cal.
18 Case No. 5:17-cv-00062-LHK; *Naranjo v. Bank of America, N.A.*, N.D. Cal. Case No. C 14-02748
19 LHK; *Ortegon-Ramirez v. Cedar Fair*, Santa Clara Sup. Ct. Case No. 1-13-CV-254098; *Pace v.*
20 *PetSmart, Inc.*, C.D. Cal. Case No. SACV13-500 DOC; *Rodriguez v. NIKE Retail Services, Inc.*, N.D.
21 Cal. Case No. 5:14-CV-1508 BLF; *Stafford v. Brink's, Incorporated*, Case No. CV 14-01352 MWF
22 (PLAx) and *Vass v. Gardner Trucking*, San Joaquin Sup. Ct. Case No. 39-2013-294819-CU-OE-STK.
23 Additionally, in *Chavez*, Case No. 15-cv-03746-NC, *Dynabursky* Case No. 8:12-cv-02210-JLS-RNB,
24 *Pace*, Case No. SACV13-500 DOC, *Rodriguez*, Case No. 5:14-CV-1508 BLF, *Stafford*, Case No. 14-
25 01352 MWF (PLAx), *Gonzales*, Los Angeles Sup. Ct. Case No. BC502826, and *Magadia*, Case No.
26 5:17-cv-00062-LHK, I was certified as class counsel pursuant to the plaintiff's motion for class
27 certification. Further, in *Stafford* and *Magadia*, we tried these certified class claims via bench trial and
28 prevailed. In *Magadia*, we obtained a \$102 million judgment for the class against Walmart, which was
reversed on appeal by the Ninth Circuit. Moreover, I have been approved as class counsel in connection

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7. The Parties recognize the risk, expense, and delay in continuing litigation with the class. GA claims, and believe the settlement to be fair, reasonable, and adequate. Each side has the other of their respective factual contentions, legal theories and defenses, resulting in negotiations taking place between the Parties. Although Plaintiff believes that the class can be certified, Plaintiff also believes in the fairness of the settlement that is based on factoring in the uncertainty and to Plaintiff involved in not prevailing on one or more of the causes of action or theories alleged in the operative Complaint, the possibility of non-certification, and the potential for appeals.

8. My only relationship with Plaintiff is the attorney-client relationship in this matter.

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

Executed on December 4, 2024, at Los Angeles, California.


DENNIS S. HYUN