

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP

Norman B. Blumenthal (SBN 068687)
Kyle R. Nordrehaug (SBN 205975)
Aparajit Bhowmik (SBN 248066)
Victoria B. Rivapalacio (SBN 275115)
Christine T. LeVu (SBN 288271)
Adolfo Sanchez Contreras (SBN 354371)
2255 Calle Clara
La Jolla, CA 92037
Telephone: (858) 551-1223
Facsimile: (858) 551-1232

Attorneys for *Plaintiffs*

[Additional counsel on following page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

LAURA WEITZ and LAILA FAIZ, individuals,
on behalf of themselves and on behalf of all
persons similarly situated, and on behalf of the
State of California, as a private attorney general,

Plaintiff,

v.

BANANA REPUBLIC, LLC, a Limited Liability
Company; THE GAP, INC., a Corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 23STCV19287

CLASS ACTION

**DECLARATION OF KWANPORN “MAI”
TULYATHAN IN SUPPORT OF
PLAINTIFF’S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: November 9, 2026
Time: 10:00 a.m.
Dept.: 11

Complaint Filed: April 17, 2023
FAC Filed: January 16, 2024

1 Larry W. Lee (State Bar No. 228175)
2 Max W. Gavron (State Bar No. 291697)
3 Kwanporn “Mai” Tulyathan (State Bar No. 316704)
4 DIVERSITY LAW GROUP, P.C.
5 515 S. Figueroa Street, Suite 1250
6 Los Angeles, CA 90071
7 (213) 488-6555
8 (213) 488-6554 facsimile
9 lwlee@diversitylaw.com
10 mgavron@diversitylaw.com
11 ktulyathan@diversitylaw.com

8 William L. Marder (State Bar No. 170131)
9 bill@polarislawgroup.com
10 Polaris Law Group
11 501 San Benito Street, Suite 200
12 Hollister, CA 95023
13 (831) 531-4214
14 (831) 634-0333 facsimile

15 *Attorneys for Plaintiffs*

1 **DECLARATION OF KWANPORN “MAI” TULYATHAN**

2 I, Kwanporn “Mai” Tulyathan, declare as follows:

3 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
4 California, and am with the law firm Diversity Law Group, counsel of record for Plaintiff Laila Faiz
5 (“Plaintiff” or “Faiz”). I have personal knowledge of the facts set forth below and if called to testify I
6 could and would do so competently.

7 2. The settlement agreement was the product of negotiations between highly able and
8 experienced attorneys on both sides who possessed the relevant data and extensive legal research which
9 they had carefully analyzed. This allowed Class Counsel to perform a detailed analysis of the claims
10 potential exposure.

11 3. I have spent significant time researching and pursuing the claims that have been alleged
12 in this action. Based on my independent investigations and evaluations, I am of the opinion that the
13 proposed settlement is fair, reasonable, and adequate, and is in the best interests of the Class Members,
14 in light of all known facts and circumstances, and the expenses and risks inherent in litigation. The
15 settlement was negotiated at arm’s length and was facilitated by an experienced and neutral mediator.
16 Thus, this settlement should be granted final approval.

17 4. I am one of the attorneys on this matter. My qualifications are as follows: I received my
18 JD from Loyola Law School in 2017. I received the First Honors Award in Legal Research and Writing,
19 First Honors Award in Appellate Advocacy, and First Honors Award in Civil Litigation Practicum I for
20 achieving the highest grade in those classes. During law school, I was a Staff Editor for Loyola Law
21 Review. I was also an extern at the U.S. District Court, Central District of California, for the Honorable
22 Christina A. Snyder, and a certified law clerk at the San Diego County District Attorney’s Office,
23 Collaborative Courts Division, and the Los Angeles County District Attorney’s Office, Consumer
24 Protection and Environmental Crimes Division. In 2016, I participated in Loyola Law School’s Scott
25 Moot Court Competition, where I placed Top 16 and was awarded the Top Ten Brief Award. In
26 2017, I participated in the Employment Rights Clinic, an extension of the Division of Labor Standards
27 Enforcement created to investigate retaliation complaints. Upon graduation from law school, I was
28 admitted to the California Bar in December 2017.

1 5. I am currently an associate at the law firm of Diversity Law Group, P.C., an employment
2 law firm that has handled numerous wage and hour class and individual actions, on both plaintiff and
3 defense sides. The firm currently has cases in numerous state courts, including the Santa Clara Superior
4 Court, Los Angeles Superior Court, Orange County Superior Court, San Diego County Superior Court,
5 Monterey County Superior Court, as well as the United States District Courts for the Central, Northern,
6 Southern, and Eastern Districts of California.

7 6. I am currently handling and/or have handled numerous wage and hour class action and
8 PAGA lawsuits.

9 7. In 2018, I argued before the California Court of Appeal, Second Appellate District, in the
10 case of *Lee v. California Commerce Club, Inc.* (California Court of Appeal Case Number B276171,
11 LASC Case Number BC596924), and *Perez v. Standard Drywall, Inc.* (California Court of Appeal Case
12 Number A146819, Alameda Sup. Ct. No. RG15761142). In that same year, I also assisted the firm in
13 successfully obtaining class certification and partial summary judgment by the United States District
14 Court, Northern District of California in the case of *Magadia v. Wal-Mart Associates, Inc.* (Case
15 Number 17-CV-00062-LHK). I third chaired the bench trial in that same case in December 2018.

16 8. I have also been certified and/or approved as class counsel in numerous other wage/hour
17 class actions. Most recently, I was certified as class counsel in the cases *Martinho v. Amazon.com, Inc.,*
18 *et al.* (N.D. Cal., Case Number 4:22-cv-06849-YGR), *Garcia v. Wal-Mart Associates, Inc., et al.* (S.D.
19 Cal., Case Number 3:18-cv-00500-L-MDD), *Richert v. Samaritan, LLC, et al.* (Santa Clara County
20 Superior Court, Case Number 17CV314186), *Song v. THC – Orange County, Inc.* (C.D. Cal., Case No.
21 8-17-cv-965-JLS (DFM)), *Hernandez v. Wells Fargo Bank National Ass’n, et al* (Santa Clara County
22 Superior Court, Case No. 16-CV-299319), and *Sims v. QG Printing II, LLC, et al.* (C.D. Cal., Case No.
23 ED CV 20-1632-DMG (KKx)), as part of the courts’ orders granting class certification pursuant to Fed.
24 R. Civ. P. 23 and California Code of Civil Procedure § 382.

25 9. Moreover, I was granted final approval as class counsel in *Lao v. H & M Hennes &*
26 *Mauritz, L.P.* (N.D. Cal., Case No. 5:16:cv-333 EJD), *Abarca v. El Estero Car Wash, Inc. et*
27 *al* (Monterey County Superior Court, Case No. 18CV003398), *Valles v. Community Hospital of the*
28 *Monterey Peninsula* (Monterey County Superior Court, Case No. 17CV003452), *Hernandez v. Wells*

1 *Fargo Bank National Ass’n, et al* (C.D. Cal., Case No. 16-CV-299319); *Baker v. California Forensic*
2 *Medical Group, Inc., et al.*, Judicial Council Coordination Proceeding No. 4999 (Lead Case No.
3 17CV003723); *Mendez v. Falcon Trading Company* (Monterey County Superior Court, Case No.
4 19CV004512).

5 10. To date, I have incurred approximately 132.3 hours in connection with the litigation of
6 this lawsuit. Attached hereto as **Exhibit A** is a chart summarizing the amount of work I have incurred to
7 date on this matter.

8 11. I also anticipate spending an additional 10 hours handling post-approval matters,
9 including conferring and reviewing e-mails and other written communications with counsel for
10 Defendant, the Settlement Administrator, and Settlement Class Members regarding post final approval
11 matters, including payments and any potential related issues.

12 12. The total lodestar for my hours will be approximately **\$92,495.00**, based on the above
13 total hours of 142.3 (132.3 hours + 10.0 anticipated hours) at an hourly rate of \$650.00 per hour.

14 13. My current billing rate is \$650.00 per hour. In 2019 and 2020, I was approved at an
15 hourly rate of \$450.00 per hour by various courts in a number of matters, including but not limited
16 to, *Lao v. H & M Hennes & Mauritz, L.P.* (N.D. Cal., Case No. 5:16:cv-333 EJD), *Hernandez v. Wells*
17 *Fargo Bank National Ass’n, et al* (C.D. Cal., Case No. 16-CV-299319), and *Abarca v. El Estero Car*
18 *Wash, Inc. et al* (Monterey County Superior Court Case No. 18CV003398). In 2021, I was approved at
19 the hourly rate of \$500.00 in various cases, including *Baker v. California Forensic Medical Group, Inc.,*
20 *et al.*, Judicial Council Coordination Proceeding No. 4999 (Lead Case No. 17CV003723); *Mendez v.*
21 *Falcon Trading Company* (Monterey County Superior Court Case No. 19CV004512); and *Truong v. DS*
22 *Services of America, Inc.* (Solano County Superior Court Case No. FCS054399).

23 14. In 2023, I was approved at the hourly rate of \$600.00 in *Moen v. Genentech, Inc.* (San
24 Diego Superior Court Case No. 37-2021-00008619-CU-OE-CTL) *Murray v. Granite Wellness Centers*
25 *et al.* (Nevada County Superior Court Case No. CU20-084680), *Norman v. B & H Global Marketing,*
26 *LLC* (Sacramento County Superior Court Case No. 34-2022-00314707), *Osman-Bravard v. Placer Title*
27 *Company* (Nevada County Superior Court Case No. CU21-085315), *Cabalo v. Jones Lang LaSalle*
28 *Americas, Inc.* (San Diego County Superior Court Case No. 37-2020-00044322-CU-OE-CTL), and *Apex*

1 *Systems Wage and Hour Cases* (Orange County Superior Court, JCCP No. 5096).

2 15. In 2025, I increased my hourly rate to \$650.00 per hour. I have been approved at this rate
3 in *Westmoreland v. Kindercare Education LLC* (N.D. Cal. Case No. 3:23-cv-03168-JD), *Torres v.*
4 *Fidelity National Management Services, LLC* (Santa Clara County Superior Court Case No.
5 23CV416377), *Chiesa et al. v. Airgas USA, LLC* (Sacramento County Superior Court Lead Case No. 34-
6 2022-00325292).

7 16. To date, Diversity Law Group has incurred costs in the amount of \$2,117.28 for litigation
8 related expenses. Attached hereto as **Exhibit B** is a true and correct copy of the cost report.

9 17. My co-counsel and I will adequately represent the Class Members in this action.
10 Plaintiff's counsel has and will zealously represent Plaintiff and the Class Members and pursue this
11 lawsuit to its conclusion.

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

14 Executed on September 18, 2026, at Los Angeles, California.

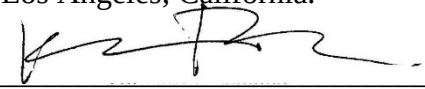
15 
16 _____
Kwanporn "Mai" Tulyathan

EXHIBIT A

Weitz/Faiz v. Banana Republic, LLC et al
Time and Task Chart for Mai Tulyathan

Hours	Description of Work
6.5	Factual investigation, review of file and client documents, review PAGA letter, confer with co-counsel and client regarding the case upon assignment to case.
1.4	Research other cases against Defendant; confer with co-counsel re same
5.6	Draft complaint; further review and revise complaint
0.2	Meet and confer with Defendant re: service
0.5	Review notice of assignment and CMC order; review ruling re: complex determination
1.5	Meet and confer with Defendant for initial CMC
5.0	Draft, review and revise various CMC statements
3.7	Draft first set of written discovery (RFPs and SROGs)
6.9	Review and analyze Defendant's responses to written discovery, set one
0.3	Review Defendant's notice of deposition of Plaintiff; confer with Plaintiff re: deposition
2.9	Meet and confer with Defendant re: demurrer and motion for sanctions; exchange correspondence re: same
4.8	Review and analyze Defendant's demurrer and supporting documents
3.5	Review and analyze Defendant's motion for sanctions
10.4	Draft opposition to demurrer and motion for sanctions; conduct research re same; further review and revise same
1.9	Draft declaration in support of opposition; prepare exhibits thereto
2.1	Meet and confer with co-counsel re: other cases; review complaints and PAGA letter
3.0	Review and revise second set of written discovery (RFPs and SROGs)
0.8	Meet and confer with Defendant re: mediation
1.5	Pre-mediation discussions with the mediator
5.0	Review exposure analysis, confer with co-counsel re: exposure analysis and dataset
9.0	Prepare for and attend mediation
1.8	Review and revise amended PAGA letter
1.7	Draft joint stipulation to continue motion hearings; meet and confer with Defendant; further review and revise same

1.5	Draft second joint stipulation to continue motion hearings; meet and confer with Defendant; further review and revise same
0.5	Review various orders on stipulation to continue
4.0	Review and revise stipulation to file Second Amended Complaint and Second Amended Complaint
3.9	Review and revise stipulated protective order
1.0	Review and revise stipulation to continue class certification filing deadline
4.2	Review and revise Memorandum of Understanding; confer with client re: same
3.7	Review and revise individual settlement agreement
14.5	Review and revise class settlement agreement and class notice
0.5	Confer with client re settlement agreements
2.8	Draft stipulation re: dismissal of the Faiz matter; confer with Defendant re: same
1.1	Further meet and confer discussions re: settlement agreement; further review and revise same
6.3	Review and revise motion for preliminary approval; draft declaration in support thereof; review checklist
0.8	Review court's ruling on preliminary approval; confer with co-counsel regarding next steps and revisions
3.5	Review and revise amended settlement agreement and supplemental filings to the court
4.0	Review and revise motion for final approval and supporting docs
<u>132.3</u>	<u>TOTAL HOURS</u>

EXHIBIT B



INVOICE

Diversity Law Group

515 South Figueroa Street, Suite 1250
Los Angeles, California 90071
lwlee@diversitylaw.com

Invoice # 10560
Invoice Date 09/18/2026
Terms Upon Receipt
Due Date 09/18/2026
PO #

Invoice Total: 2,117.28
Payment Applied: 0.00
Total Due: 2,117.28

Summary By Type

Type	Description	Subtotal	Discount	Tax	Total
Fees & Other Charges		0.00	0.00	0.00	0.00
Billed Time		0.00	0.00	0.00	0.00
Expenses		2,117.28	0.00	0.00	2,117.28
		\$2,117.28	\$0.00	\$0.00	\$2,117.28

Summary By Matter

Matter	Fee and Other Charges	Billed Time	Expenses	Discount	Tax	Total
Faiz, Laila v. The Gap, Inc.	0.00	0.00	2,117.28	0.00	0.00	2,117.28
	\$0.00	\$0.00	\$2,117.28	\$0.00	\$0.00	\$2,117.28

Subtotal: \$2,117.28
Discount: \$0.00
Subtotal after Discount:\$2,117.28
Taxable Subtotal: \$2,117.28
Tax: \$0.00
Total: \$2,117.28
Payment Applied: \$0.00
Total Due: \$2,117.28

Notes

Terms & Conditions



INVOICE

Diversity Law Group

515 South Figueroa Street, Suite 1250
Los Angeles, California 90071
lwlee@diversitylaw.com

Invoice # 10560
Invoice Date 09/18/2026
Terms Upon Receipt
Due Date 09/18/2026
PO #

Summary- Faiz, Laila v. The Gap, Inc. (6045.001)

Type	Description	Amount
Fees & Other Charges		0.00
Billed Time		0.00
Expenses		2,117.28

Subtotal: \$2,117.28
Discount: \$0.00
Subtotal after Discount:\$2,117.28
Taxable Subtotal: \$2,117.28
Tax: \$0.00
Total: \$2,117.28

Details - Faiz, Laila v. The Gap, Inc. (6045.001)

Expenses

Date	Category	Expense Code	Description	Amount (\$)
09/18/2023		Court fees	LWDALWDA	75.00
09/30/2023		Photocopies	PhotocopiesPhotocopies	0.25
09/30/2023		Postage	PostagePostage	8.53
11/28/2023		Court fees	ACE E Filing - ComplaintACE E Filing - Complaint	1,495.90
01/09/2024		Online research	Online FAC in Arman v. Banana Republic	12.20
01/16/2024		Online research	Online OrdersOnline Orders	6.00
01/16/2024		Online research	Online DocsOnline Docs	7.00
02/21/2024		Court fees	ACE E Filing - N&A & POS of Summons	17.85
03/19/2024		Court fees	ACE E Filing - CMSACE E Filing - CMS	17.85
07/10/2024		Court fees	ACE E Filing - Stip to Cont Hearings	38.45
07/17/2024		Court fees	ACE E Filing - NOEACE E Filing - NOE	17.85
09/13/2024		Court fees	ACE E Filing - Oppo to Demurrer & Mtn for	19.40
09/19/2024		Court fees	ACE E Filing - CMSACE E Filing - CMS	19.40
09/19/2024		Court fees	ACE E Filing - Stip to Cont Hearings	40.00
09/25/2024		Court fees	ACE E Filing - NOEACE E Filing - NOE	19.40
10/21/2024		Court fees	ACE E Filing - Stip to DismissACE E Filing - Stip to Dismiss	40.00



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Invoice # 10560
Invoice Date 09/18/2026
Terms Upon Receipt
Due Date 09/18/2026
PO #

Date	Category	Expense Code	Description	Amount (\$)
11/08/2024		Court fees	ACE E Filing - NOEACE E Filing - NOE	19.40
12/16/2024		Online research	Online OrderOnline Order	6.60
04/24/2025	Court Fees		WIP	250.00
07/16/2025	Court Fees		Online Order in Weitz case	6.20
Subtotal:				\$2,117.28
Total:				\$2,117.28