

1 **JUSTICE FOR WORKERS, P.C.**

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF LOS ANGELES**

10
11 JUNG HO LEE, an individual and on behalf of
all others similarly situated;

12 Plaintiff,

13 vs.

14
15 VIZIO SERVICES, LLC, a Delaware limited
liability company; and DOES 1 through 50,

16 Defendants.

Case No.: 23STCV24004

[Assigned for All Purposes to:
Hon. Bruce G. Iwasaki, Dept. SS11]

**SUPPLEMENTAL DECLARATION OF
WILLIAM C. SUNG IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

DATE: June 11, 2026

TIME: 10:15 a.m.

DEPT: 11

Action Filed: October 13, 2023

Trial Date: Not Set

1 I, William C. Sung, hereby declare as follows:

2 1. I am an attorney licensed to practice law in the state of California and have been
3 admitted to practice before this Court. I am an attorney with the law firm of Justice for Workers,
4 P.C., counsel of record for Plaintiff Jung Ho Lee (“Plaintiff”) in this action. I am lead counsel for
5 Plaintiff in this case and I have personal knowledge of the matters stated herein and if called and
6 sworn as a witness, I would and could competently testify under oath thereto.

7 2. Enclosed as **Exhibit 1** is a true and correct copy of the executed Amended Class
8 Action and PAGA Settlement Agreement (“Amended Agreement”) which incorporated all of the
9 Court’s comments and concerns raised at the May 7, 2026 hearing on Plaintiff’s Motion for
10 Preliminary Approval.

11 3. Enclosed as **Exhibit 2** is a true and correct copy of the redlined Amended Class
12 Action and PAGA Settlement Agreement, which shows all edits made to the original Class Action
13 and PAGA Settlement Agreement.

14 4. Enclosed as **Exhibit 3** is a true and correct copy of the redlined Amended Proposed
15 Order Granting Preliminary Approval of Class Action and PAGA Settlement (“Amended Proposed
16 Order”), which shows all edits made to the original Proposed Order Granting Preliminary Approval
17 of Class Action and PAGA Settlement. A clean copy of the Amended Proposed Order is submitted
18 to the Court concurrently herewith.

19 5. On May 25, 2026, I uploaded a copy of the Amended Agreement and Amended
20 Proposed Order to the LWDA’s website. Enclosed as **Exhibit 4** is a true and correct copy of the
21 LWDA’s filing confirmation.

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

3 Executed on May 25, 2026 at Los Angeles, California.

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William C. Sung