

1 D.LAW, INC.
Emil Davtyan (SBN 299363)
2 emil@d.law
David Yeremian (SBN 226337)
3 d.yeremian@d.law
David Keledjian (SBN 309135)
4 d.keledjian@d.law
David Arakelyan (SBN 337076)
5 d.arakelyan@d.law
450 N Brand Blvd. Ste. 840
6 Glendale, CA 91203
Telephone: (818) 962-6465
7 Facsimile: (818) 962-6469

8 Attorneys for Plaintiff RASHEDA K. KIRBY
9 [ADDITIONAL COUNSEL ON NEXT PAGE]

10
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF SAN MATEO**

13 RASHEDA K. KIRBY and AMOURA
14 BURTON, on behalf of themselves and all
15 others similarly situated, and the general
public,

16 *Plaintiffs,*

17 v.

18 TROVE RECOMMERCE, INC., a Delaware
19 corporation; TROVE, INC., a business entity
20 of unknown form; YERDLE, INC., a
California corporation; and DOES 1 through
21 50, inclusive,

22 *Defendants.*

Case No.: 23-CIV-04345

[Assigned for All Purposes to:
Hon. Jeffrey R. Finigan, Dept. 24]

CLASS ACTION

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

(Filed concurrently with Motion for
Preliminary Approval; Supporting
Declarations; and [Proposed] Order)

DATE: August 1, 2025
TIME: 2:00 p.m.
DEPT: 24

Action Filed: September 13, 2023
Trial Date: Not Set

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

William C. Sung, SB# 280792

2 E-Mail: william@justiceforworkers.com

Tiffany L. Luu, SB# 335127

3 E-Mail: tluu@justiceforworkers.com

3600 Wilshire Boulevard, Suite 1815

4 Los Angeles, CA 90010

5 Tel: 323-922-2000

Fax: 323-922-2000

6 Attorneys for Plaintiff AMOURA BURTON

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 Amoura Burton (“Plaintiff Burton”) in this action. I am lead
5 counsel for Plaintiff Burton in this case and I have personal knowledge of the matters stated herein
6 and if called and sworn as a witness, I would and could competently testify under oath thereto.

7 **ATTORNEY QUALIFICATIONS**

8 2. My qualifications are as follow: I received my J.D. from the University of Southern
9 California Gould School of Law in 2011. During law school, I served as the Senior Content Editor
10 on the Southern California Law Review where I published the article: *Taking the Fight Back to Title*
11 *VII: A Case for Redefining “Because of Sex” to Include Gender Stereotypes, Sexual Orientation,*
12 *and Gender Identity*, Southern California Law Review, Volume 84:2 (Jan. 2011). During law
13 school, I also served as a judicial extern to U.S. Ninth Circuit Judge, Hon. Kim M. Wardlaw, and
14 U.S. Bankruptcy Court Judge, Hon. Ernest M. Robles; served as a law clerk to the General Counsel
15 of JM Eagle; and participated in the law school’s Employer Legal Advice Clinic.

16 3. After passing the California Bar in December 2011, I began practicing management-
17 side employment law at the Los Angeles office of Lewis Brisbois Bisgaard & Smith LLP. In 2013, I
18 began focusing my practice at Lewis Brisbois on representing employers in wage and hour class and
19 PAGA action lawsuits. In January 2017, I was elevated to the position of Partner and Vice Chair of
20 Lewis Brisbois’ Wage & Hour Class Action Practice Group. In November 2020, I was elevated as
21 the Co-Chair of Lewis Brisbois Wage & Hour Class Action Practice Group, becoming one of the
22 youngest attorneys to chair a practice group at the firm. In January 2022, I was voted in as an equity
23 partner, becoming one of the youngest equity partners and the third Asian-American equity partner
24 in the history of this 1,500-attorney firm.

25 4. In May 2023, I left Lewis Brisbois and co-founded Barber Ranen LLP.

26 5. In July 2023, I joined Justice for Workers, P.C. (“JFW”) and began heading its
27 Complex Litigation Practice Group where I focus my practice on representing employees in wage
28 and hour class and PAGA action lawsuits.

1 6. In my current practice at JFW, I serve as the lead plaintiff's counsel on over 100
2 pending class and/or PAGA actions. In addition to this matter, I have resolved over 30 other class
3 and/or PAGA actions at mediation. The following are cases in which I have received final or
4 preliminary approval of class action and/or PAGA settlement and I was appointed as class and/or
5 PAGA counsel: *Jorge Nieto v. Pick-Your-Part Auto Wrecking*, Riverside Superior Court Case No.
6 CVRI2402255, approval of PAGA settlement granted on May 29, 2025; *Ted Kim v. Hyundai*
7 *America Technical Center, Inc.*, San Bernardino Superior Court Case No. CIVSB2326861, approval
8 of PAGA settlement granted on May 21, 2025; *Eric Echeverria v. Fireclay Tile Inc.*, San Benito
9 Superior Court Case No. CU-23-00249, final approval of class/PAGA settlement granted on May 7,
10 2025; *Isaias Velasco v. Nature's Produce*, Los Angeles County Superior Court Case No.
11 23STCV23811, approval of PAGA settlement granted on April 29, 2025; *Norma Borquez v. Smart*
12 *Metals Recycling LLC*, Yolo Superior Court Case No. CV2024-0050, final approval of class/PAGA
13 settlement granted on April 4, 2025; *Juan Hinojos Campos v. Applied Technology Group, Inc.*,
14 Kern Superior Court Case No. BCV-23-103067, final approval of class/PAGA settlement granted
15 on March 11, 2025; *Dennisha Lampkin v. Sunstates Security, Inc.*, Riverside Superior Court Case
16 No. CVRI2305600, final approval of class/PAGA settlement granted on December 18, 2024; *Pedro*
17 *Hernandez v. Edmund A. Gray Co.*, Los Angeles Superior Court Case No. 24STCV04118,
18 preliminary approval of class/PAGA settlement granted on April 9, 2025; *Jose Regalado v. United*
19 *Markets*, Marin County Superior Court Case No. CV0001169, preliminary approval of class/PAGA
20 settlement granted on March 28, 2025; *Mushfiqur Chowdhury v. CWT US, LLC*, Los Angeles
21 Superior Court Case No. 23STCV25373, preliminary approval of class/PAGA settlement granted
22 on March 24, 2025; *Alexis Bartram v. Lakeshore Learning Materials, LLC*, Los Angeles Superior
23 Court Case No. 23STCV21174, preliminary approval of class/PAGA settlement granted on March
24 5, 2025; and *Randall Bachman v. Geodis Logistics LLC*, Riverside Superior Court, Case No.
25 CVRI2400956, preliminary approval of class/PAGA settlement granted on January 22, 2025.

26 7. During my tenure as a wage and hour class action defense attorney, I have
27 represented employers in over 80 wage and hour class and/or PAGA action lawsuits. The following
28 is a list of wage and hour class and/or PAGA actions where I served as lead defense counsel or

1 primary handling attorney and in which final settlement approval was granted, I tried the case to
2 verdict, or I obtained a denial of motion for class certification: *Sylvia Martinez v. CCS Engineering*
3 *Fresno, Inc., et al.*, Los Angeles Superior Court, No. 22STCV14985, filed May 4, 2022 (PAGA
4 settlement approved on May 13, 2023); *Fidel Cruz v. Crescent Hotels & Resorts, LLC*, Sacramento
5 Superior Court, No. 34-2021-00299126, filed April 20, 2021 (PAGA settlement approved on
6 January 14, 2022); *Sidney Judge v. Aliso Viejo Brewing Company*, Orange County Superior Court,
7 No. 30-2021-01178139-CU-OE-CXC, filed January 8, 2021 (Class/PAGA settlement approved on
8 January 18, 2023); *Joseph Montgomery v. Copart, Inc.*, Sacramento Superior Court, No. 34-2020-
9 00280733, filed June 15, 2020 (Class/PAGA settlement approved on February 14, 2023); *Khawla*
10 *Majdoub v. Argent Hotel Management, LLC, et al.*, San Francisco Superior Court, No.
11 CGC20582921, filed February 13, 2020 (Class/PAGA settlement approved on September 9, 2022);
12 *Irene Quesada v. California Commerce Club, Inc.*, Los Angeles Superior Court, No.
13 19STCV41482, filed November 18, 2019 (PAGA settlement approved on November 17, 2021); *FPI*
14 *Management Wage and Hour Cases*, Los Angeles Superior Court, No. JCCP5050, filed August 19,
15 2019 (Class/PAGA settlement of two included cases approved on September 9, 2022); *Stephanie*
16 *Ouellette v. MKTG, Inc, et al.*, Los Angeles Superior Court, No. 19STCV27487, filed August 2,
17 2019 (Class/PAGA settlement approved on March 21, 2023); *Naomi Guynn-Neupane v. Magna*
18 *Legal Services, LLC, et al.*, U.S. District Court, Northern District of California, No. 5:19-CV-
19 02652, filed May 15, 2019 (Plaintiff's motion for class certification denied and defendant's motion
20 for summary judgment granted on October 6, 2021); *Janelle Murphy v. BBVA Compass*,
21 Sacramento Superior Court, No. 34-2018-00241658, filed September 28, 2018 (Class/PAGA
22 settlement approved on November 20, 2020); *George Gunn v. Shimadzu Precision Instruments,*
23 *Inc.*, Los Angeles Superior Court, No. BC719424, filed August 31, 2018 (Class/PAGA settlement
24 approved on June 22, 2020); *Lizbeth Garcia v. The Bay Clubs Company LLC*, San Diego Superior
25 Court, No. 37-2018-00029247-CU-OE-CTL, filed June 13, 2018 (PAGA settlement approved on
26 March 14, 2022); *Miguel Casillas v. FPI Management, Inc.*, Sacramento Superior Court, No. 34-
27 2018-00227643, filed February 22, 2018 (PAGA settlement approved on October 10, 2018); *Jesus*
28 *A. Hernandez v. J.V.C. Trucklines, Inc.*, San Bernardino Superior Court, No. CIVDS1714857, filed

1 August 3, 2017 (Class/PAGA settlement approved on May 22, 2018); *Mireya Castrejon v. CCS*
2 *Orange County Janitorial, Inc.*, Orange County Superior Court, No. 30-2017-00920076-CU-OE-
3 CXC, filed May 12, 2017 (Class/PAGA settlement approved on November 17, 2021); *Alfonso*
4 *Valadez v. California Commerce Club, Inc.*, Los Angeles Superior Court, No. BC644587, filed
5 December 20, 2016 (PAGA settlement approved on December 17, 2021); *Loreta B. Gharghani v.*
6 *Gefer Farms, Inc., et al.*, Los Angeles Superior Court, No. BC624938, filed June 23, 2016 (PAGA
7 settlement approved on January 14, 2021); *Salvador Magana v. Normandie Club Incorporated*, Los
8 Angeles Superior Court, No. BC621737, filed May 25, 2016 (Class/PAGA settlement approved on
9 October 26, 2018); *Kejuan Moore v. Farwest Insulation Contracting*, Los Angeles Superior Court,
10 No. BC588118, filed July 15, 2015 (PAGA settlement approved on August 26, 2016); *Maria*
11 *Dominguez v. Viva Bargain Center, Inc., et al.*, Los Angeles Superior Court, No. BC588049, filed
12 July 14, 2015 (Class/PAGA settlement approved on June 13, 2017); *Valentin Maracine v. Mesa*
13 *Verde Convalescent Hospital, Inc.*, Orange County Superior Court, No. 30-2015-00780115-CU-
14 OE-CXC, filed April 1, 2015 (Class/PAGA settlement approved on July 7, 2017); *Judy Pittacora, et*
15 *al. v. Aurora Vista Del Mar, LLC*, Ventura County Superior Court, No. 56-2014-00454445-CU-OE-
16 VTA, filed June 20, 2014 (Class/PAGA settlement approved on October 20, 2016); *Iffat "Iffy" Khan*
17 *v. FPI Management, Inc.*, Los Angeles Superior Court, No. BC541747, filed April 4, 2014
18 (Class/PAGA settlement approved on January 4, 2018); *Michael Luparello v. VIP Tours of*
19 *California, Inc., et al.*, Los Angeles Superior Court, No. BC538570, filed March 6, 2014 (First-
20 chaired certified class action trial through judgment on behalf of one of the defendants on August
21 16, 2019); *Bertram Riddick v. WDI International, Inc.*, Los Angeles Superior Court, No. BC507786,
22 filed May 2, 2013 (Class settlement approved on February 21, 2017); *Pedro Aviles v. Super A*
23 *Foods, Inc.*, Los Angeles Superior Court, No. BC504376, filed March 29, 2013 (Class/PAGA
24 settlement approved on March 9, 2016); *Jose Chavez v. Vallarta Food Enterprises, Inc., et al.*, Los
25 Angeles Superior Court, No. BC490630, filed August 21, 2012 (Class/PAGA settlement approved
26 on November 10, 2014); and *Melinda Gonzalez v. Workforce Outsourcing, Inc., et al.*, Los Angeles
27 Superior Court, No. BC489320, filed July 31, 2012 (Class/PAGA settlement approved on February
28 5, 2016).

1 8. As counsel for Plaintiff Burton and the proposed Class, I have been intimately
2 involved in this case since its inception and I believe that the proposed class settlement is an
3 excellent result for the Class.

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

6 Executed on June 23, 2025 at Los Angeles, California.

7
8 

9 _____
10 William C. Sung
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28