

Lilit Tunyan (SBN 329351)
ltunyan@tunyanlaw.com
Artur Tunyan (SBN 349174)
atunyan@tunyanlaw.com
TUNYAN LAW, APC
535 N. Brand Blvd., Suite 285
Glendale, California 91203
Telephone: (323) 410-5050

Seung Yang (SBN 249857)
seung.yang@thesentinel-firm.com
Tiffany Hyun (SBN 311743)
tiffany.hyun@thesentinel-firm.com
THE SENTINEL FIRM, APC
355 S. Grand Ave., Suite 1450
Los Angeles, California 90071
Telephone: (213) 985-1150
Facsimile: (213) 985-2155

Attorneys for Plaintiff ROBERTO GOMEZ, as an individual
and on behalf of all employees similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO**

ROBERTO GOMEZ, as an individual and on
behalf of all employees similarly situated,

Plaintiff,

v.

SIGMA COMPANIES INTERNATIONAL
CORP., a Delaware corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: CIVSB2404346

[Assigned for all purposes to Hon. Christian
Towns]

**CLASS AND PAGA REPRESENTATIVE
ACTION**

**DECLARATION OF SEUNG YANG IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND PAGA REPRESENTATIVE
ACTION SETTLEMENT**

Date: April 23, 2026
Time: 8:30 a.m.
Courtroom: Dept. S-26
Judge: Hon. Christian Towns

Action Filed: January 31, 2024
Trial Date: Not Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

1. I am an attorney duly licensed to practice as such before all the Courts of the State of California and am one of the attorneys of record for Plaintiff Roberto Gomez (“Plaintiff”) and the putative Class.
2. I have personal knowledge of the matter set forth herein and could competently testify to the facts described herein.

EXPERIENCE AND QUALIFICATIONS

4. From approximately 2007 to 2010, I began my legal career at the law firm of Lim, Ruger & Kim, LLP (“LRK”), now known as LimNexus LLP, and worked as an associate in the litigation department. At LRK, my practice consisted primarily of commercial litigation and employment defense work.

6. From 2010 to 2023, I assumed the role of Managing Partner at Moon & Yang, where my primary duties included managing and growing the firm from 2 attorneys to over 20. During this time, Moon & Yang became one of the largest plaintiff's firms in California

1 that specialized in wage and hour class action lawsuits. I was either the lead partner or assisted
2 in the litigation and settlement of hundreds of cases including class action and PAGA action
3 cases.

4 7. In the Summer of 2023, I sold my ownership interest in Moon & Yang to create
5 a new firm, The Sentinel Firm, APC (“The Sentinel Firm”). Since its inception, The Sentinel
6 Firm has focused exclusively on the prosecution of plaintiff-side employment cases as well as
7 personal injury cases. In addition to the present case, The Sentinel Firm are the attorneys of
8 record in over a hundred employment-related putative wage-and-hour class action lawsuits
9 pending in state and federal jurisdictions through the State of California. During this relatively
10 short time, The Sentinel Firm have recovered millions of dollars on behalf of thousands of
11 employees in the State of California.

12 8. Throughout my career, I have represented thousands of individuals in
13 employment cases under the Fair Employment and Housing Act and those involving wage and
14 hour claims, and in personal injury cases. I have litigated both federal and state employment
15 discrimination cases from intake through the trial, successfully opposed voluminous motions
16 for summary judgment, and has participated in hundreds of highly effective mediations that
17 resulted in six and seven-figure settlements. In recognition of my professional achievements, I
18 was selected by Super Lawyers as a Rising Star from 2018 – 2020 and recognized by The
19 National Trial Lawyers as one of the Top 100 Trial Lawyers in California, amongst other
20 achievements.

21 9. I currently serve as a member of the California Employment Lawyers
22 Association (CELA). CELA is a statewide organization of approximately 1,200 attorneys who
23 devote the majority of their practices to representing employees in individual and class
24 actions, including cases involving unpaid wages, discrimination, harassment, retaliation and
25 whistleblowing.

26 10. From 2007 to 2016, I also served as a member of the Korean American Bar
27 Association in Southern California (“KABA”). In this capacity, I volunteered numerous hours
28 advancing legal issues affecting the Korean community in Southern California by translating

1 for and assisting members of the Korean immigrant community in pro bono clinics. From
2 2010 to 2014, I was on the Board of Governors for KABA.

3 **TIFFANY HYUN’S EXPERIENCE AND QUALIFICATIONS**

4 11. Tiffany Hyun graduated from the University of California, Irvine in 2010 with a
5 Bachelor of Arts degree in Global Cultures and Minor in English. Ms. Hyun received her Juris
6 Doctor degree from Loyola Law School in 2015. Ms. Hyun obtained her license to practice
7 law from the California State Bar in 2016.

8 12. From approximately 2017 to 2024, Ms. Hyun was employed as an associate
9 attorney by the law firm Lawyers for Justice, PC (“Lawyers for Justice”). At Lawyers for
10 Justice, her practice focused entirely on wage and hour class actions and PAGA actions.
11 During her time at Lawyers for Justice, Ms. Hyun was involved in the litigation and settlement
12 of hundreds of class and/or PAGA actions.

13 13. Since approximately April of 2024, Ms. Hyun is employed as a senior associate
14 attorney at The Sentinel Firm. Ms. Hyun’s practice focuses almost exclusively on wage and
15 hour class actions and PAGA actions.

16 14. During the course of her career, Ms. Hyun has managed hundreds of wage and
17 hour class and PAGA actions, and employment actions under the Fair Employment and
18 Housing Act from inception through resolution. Ms. Hyun has experience in various aspects of
19 class action and PAGA action litigation, including, but not limited to: drafting complaints and
20 PAGA notice letters, drafting and arguing motions, taking depositions, working with experts
21 to analyze time and payroll data for purposes of both settlement negotiations and contested
22 class certification motions, drafting mediation briefs and class wide damages analyses, and
23 mediating class action and PAGA action cases. Ms. Hyun has participated in hundreds of
24 mediations and has settled hundreds of wage and hour class and/or PAGA actions. Ms. Hyun
25 is a current member of the California Employment Lawyers Association, and was selected by
26 Super Lawyers as a Southern California Rising Star in 2021, 2022, 2024, and 2025.

27 15. My office is qualified to handle this litigation because we are experienced in
28 litigation Labor Code violations in individual, class, and PAGA actions. Including myself, The

1 Sentinel Firm is comprised of ten attorneys, all of whom are actively and continuously
2 practicing employment litigation, representing almost entirely employee plaintiffs, in
3 individual, class, and PAGA actions, in various state and federal jurisdictions throughout the
4 State of California. The attorneys at my firm have a high level of knowledge and experience in
5 areas of wage and hour class actions, and labor and employment law.

6 16. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
7 Settlement is in the best interests of Plaintiff, Class Members, the State of California, and
8 PAGA Members.

9 17. I have no knowledge of any actual or potential conflict of interest with Phoenix
10 Class Action Administration Solutions which was selected by the Parties as a Settlement
11 Administrator.

12 18. I am not aware of any other pending matter or action asserting claims that will
13 be extinguished or adversely affected by the Settlement.

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

16 Executed on December 22, 2025, at Los Angeles, California.



17
18
19 Seung Yang, Esq., Declarant
20
21
22
23
24
25
26
27
28

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3) ss
4 COUNTY OF LOS ANGELES)

5 I am employed in the county of Los Angeles, State of California. I am over the age of 18
6 and not a party to the within action; my business address is 355 S. Grand Ave., Suite 1450
Los Angeles, CA 90071. On December 22, 2025, I served the foregoing document described as:

7 **DECLARATION OF SEUNG YANG IN SUPPORT OF PLAINTIFF'S MOTION FOR**
8 **PRELIMINARY APPROVAL OF CLASS AND PAGA REPRESENTATIVE ACTION**
9 **SETTLEMENT**

10 X by placing ____ the original X a true copy thereof enclosed in sealed envelope(s)
addressed as follows:

11 David A. Garcia
12 david.garcia@ogletree.com
Hailey Tull
13 hailey.tull@ogletreedeakins.com
Susan Susebach
14 susan.susebach@ogletreedeakins.com
15 **OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.**
695 Town Center Drive, Suite 1500
Costa Mesa, CA 92626
Telephone: 714-800-7982

16 **Attorneys for Defendant SIGMA COMPANIES INTERNATIONAL CORP.**

17 [✓] **BY U.S. MAIL:** I deposited such envelope in the mail at Los Angeles, California. The
18 envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with
19 the firm's practice of collection and processing correspondence for mailing. Under
20 that practice it would be deposited with U.S. postal service on that same day with
21 postage thereon fully prepaid at Los Angeles, California in the ordinary course of
22 business. I am aware that on motion of the party served, service is presumed invalid if
postal cancellation date or postage meter date is more than one day after date of deposit
for mailing in affidavit.

23 X (State) I declare under penalty of perjury under the laws of the State of
California that the above is true and correct.

24 Executed on December 22, 2025 at Glendale, California.

25 Ivette Hernandez

26 Name

Signature