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

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

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

Plaintiff,

vs.

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

Defendants.

Case No.: CIVSB2404346

[Assigned for All Purposes to:
Hon. Kevin C. Lee, Dept. S-26]

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

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

DECLARATION OF SEUNG YANG

I, Seung Yang, hereby declare as follows:

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.

3. On April 24, 2026, the Court preliminarily approved the Settlement Agreement entered into between Plaintiff and defendant Sigma Companies International Corp. ("Defendant") and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff Gomez as the representative of the Class ("Class Representative"). The Court also preliminarily appointed and designated Tunyan Law, APC and The Sentinel Firm, APC as counsel for the Class (together, "Class Counsel"). The Court approved and ordered the mailing of the court approved Class Notices, Request for Exclusion Forms and Objection Forms ("Notie Packets") , and adopted the notice, opt-out, and objection procedures, and ordered their implementation.

WORK PERFORMED BY CLASS COUNSEL

4. Several attorneys at the Sentinel Firm, APC have been actively engaged in litigating this matter since the inception of the above-captioned action (the "Action"), which was filed on January 31, 2024 and which our offices official appeared in on March 6, 2025.

5. Including myself, four (4) attorneys who have actively and continuously represented plaintiff in employment class actions and representative actions in Superior Courts throughout the State of California, in the Court of Appeal, and in various Federal courts spent time litigating and prosecuting this matter. Each member of the Sentinel Firm, APC is qualified to evaluate the risks and benefits of both litigation and settlement in this matter and recommend this Settlement as fair and reasonable to the Class. Because of the unique history and nature of our practice, all of the attorneys at the Sentinel Firm, APC have a high level of knowledge and experience in labor and employment law. The following attorneys at Sentinel Firm, APC spent significant time working on this matter:

Seung Yang – I am the founder and Managing Partner of the Sentinel Firm, APC. I graduated from the University of California, San Diego in 2002 with a Bachelor of Arts degree in Political Science and Minor in Law and Society. I received my Juris Doctor from Loyola Law School in 2006. I obtained my license to practice law from the California State Bar in June 2007. From approximately 2007 to 2010, I began his 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. In 2010, I, along with a prior partner, formed Moon & Yang, APC ("Moon &Yang"). Initially, my practice was focused on commercial litigation and employment defense work. In 2014, Moon & Yang stopped taking defense work, and instead became a plaintiff's firm, representing employees who traditionally did not have the financial means to participate in the legal system. Moon & Yang and its attorneys have tried both bench and jury trials (representing both plaintiff and defendants) relating to employment matters and have been appointed lead or co-lead class counsel in hundreds of federal and state courts in California. 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 that specialized in wage and hour class action lawsuits. I was either the lead partner or assisted in the litigation and settlement of hundreds of cases including class action and PAGA action cases. In the Summer of 2023, I sold my ownership interest in Moon & Yang to create a new firm, The Sentinel Firm, APC ("The Sentinel Firm"). Since its inception, The Sentinel Firm has focused exclusively on the prosecution of plaintiff-side employment cases as well as personal injury cases. In addition to the present case, The Sentinel Firm are the attorneys of record in over a hundred employment-related putative wage-and-hour class action lawsuits pending in state and federal jurisdictions through the State of California and have been certified as Class and/or PAGA counsel numerous times. During this relatively short time, The Sentinel Firm have recovered millions of dollars on behalf of thousands of employees in the State of California. Throughout his career, I have represented thousands of individuals in employment cases under the Fair Employment and Housing Act and

those involving wage and hour claims, and in personal injury cases. I have litigated both federal and state employment discrimination cases from intake through the trial, successfully opposed voluminous motions for summary judgment, and have participated in hundreds of highly effective mediations that resulted in six and seven-figure settlements. In recognition of his professional achievements, I was selected by Super Lawyers as a Rising Star from 2018 – 2020 and recognized by The National Trial Lawyers as one of the Top 100 Trial Lawyers in California, amongst other achievements. I currently serve as a member of the California Employment Lawyers Association (CELA). CELA is a statewide organization of approximately 1,200 attorneys who devote the majority of their practice to representing employees in individual and class actions, including cases involving unpaid wages, discrimination, harassment, retaliation and whistleblowing. From 2007 to 2016, I also served as a member of the Korean American Bar Association in Southern California ("KABA"). In this capacity, I volunteered numerous hours advancing legal issues affecting the Korean community in Southern California by translating for and assisting members of the Korean immigrant community in pro bono clinics. From 2010 to 2014, MI was on the Board of Governors for KABA. Based on my almost 19 years in practice, my billing rate has been approved at $950 per hour in similar cases in the region.

Tiffany Hyun – Ms. Hyun serves as Lead Complex Litigation and Class Action Attorney for the Sentinel Firm, APC, and has continuously served in this position at the Sentinel Firm, APC since approximately April of 2024. Ms. Hyun currently serves as the lead attorney maintaining oversight of this case at the Sentinel Firm, APC along with the Managing Partner, Seung Yang. Ms. Hyun graduated from the University of California, Irvine in 2010 with a Bachelor of Arts degree in Global Cultures and Minor in English and received her Juris Doctor degree from Loyola Law School in 2015. Ms. Hyun obtained her license to practice law from the California State Bar in 2016. From approximately 2017 to 2024, Ms. Hyun was employed as an associate attorney by the law firm Lawyers for Justice, PC ("Lawyers for Justice"). At Lawyers for Justice, her practice focused entirely on wage and hour class actions and PAGA actions. During Ms. Hyun's time at Lawyers for Justice, she was involved in the litigation and settlement of

hundreds of class and/or PAGA actions. Ms. Hyun's practice focuses almost exclusively on wage and hour class actions and PAGA actions. During the course of her career, Ms. Hyun has managed hundreds of wage and hour class and PAGA actions, and employment actions under the Fair Employment and Housing Act from inception through resolution. Ms. Hyun has experience in various aspects of class action and PAGA action litigation, including, but not limited to: drafting complaints and PAGA notice letters, drafting and arguing motions, taking depositions, working with experts to analyze time and payroll data for purposes of both settlement negotiations and contested class certification motions, drafting mediation briefs and class wide damages analyses, and mediating class action and PAGA action cases. Ms. Hyun has participated in hundreds of mediations and has settled hundreds of wage and hour class and/or PAGA actions and have been named Class and/or PAGA counsel in dozens of actions. She is a current member of the California Employment Lawyers Association and was selected by Super Lawyers as a Southern California Rising Star in 2021, 2022, 2024, and 2025. Ms. Hyun's billing rate has been previously approved in similar matters at $800 per hour.

Jeffrey P. Jackson – Mr. Jackson is an attorney serving as the Lead Law and Motion Attorney at the Sentinel Firm, APC. Mr. Jackson received his Bachelor of Arts degree from the University of California – San Diego, and a Juris Doctor degree (*cum laude*) from the California Western School of Law. He was admitted to practice law in California in June of 2013, and has also been admitted to the Southern, Central and Eastern Districts of California. Mr. Jackson has significant experience in representative wage and hour claims, as PAGA Counsel, Class Counsel and in FLSA Collective Actions and has been appointed Class Counsel both conditionally and in contested motions for class certification. Some of the matters in which Mr. Jackson has been appointed Class Counsel are the following cases: *Avilez v. Omnicare*, San Diego Superior Court Case No. 37-2014-00084453; *Gonzalez v. Pacific Honda*, San Diego Superior Court Case No. 37-2014-00084068; *Vazquez v. International Marine and Industrial Applicators*, San Diego Superior Court Case No. 37-2014-000320431; *Schaffer v. Rady Children's Hospital*, San Diego Superior Court Case No. 37-2015-00022978; *Gomez v. La Cantina Doors*, San Diego Superior

Court Case No. 37-2015-00037380; *Webb v. Alpha and Omega Services, Inc.*, Central District of California Case No. 16-cv-1609-RGK-KK; *Castro v. Apple American Group*, San Diego Superior Court Case No. 37-2015-00037599; *Dials v. Pritsker, et al*., San Diego Superior Court Case No. 37-2017-00004777, *Diersing v. Sharp-Rees Stealy Medical Group, Inc., et. al.* Case No. 37-2017-00029164-CU-OE-CTL. *George Martinez v. Northwest Exteriors, Inc*., Sacramento County Superior Court Case No. 34-2022-00318192, *Darrell Alexander v. Farmdale Creamery, Inc.,* San Bernardino County Superior Court Case No. CIVSB2205382, *Maritza Gutierrez, et al. v. La Clinica de la Raza, Inc.,* Alameda County Superior Court Case No. RG19010781, *Johnson, et. al. v. Weckworth Electric Group, Inc*., Alameda County Superior Court Case No. 21CV001491; *Jose Ruiz Vidal, et. al. v. Faria Land and Cattle Company, LLC*, Tulare County Superior Court Case No. VCU310614; *Rodriguez v. District Council of Contra Costa County Society of St. Vincent De Paul, Diocese of Oakland*, Contra Costa County Superior Court Case No. C24-01377, *Angelina Gomez Gonzalez, v. Vege Labs LLC*, Los Angeles County Superior Court Case No. 24STCV13232; *Monroe v. Table Bluff Brewing, Inc.*; Humboldt County Superior Court Case No. CV2401291. This represents only a fraction of the matters on which Mr. Jackson has been approved as class counsel. Mr. Jackson has also appeared as counsel of record in dozens of standalone PAGA Actions. Mr. Jackson is an active member of the California Employment Lawyers Association ("CELA") and routinely attends events held by that association. Based on almost 13 years in practice focusing exclusively on employment law, Mr. Jackson's billing rate has been approved at a rate of $800 in similar matters.

Jessica Abreu –Ms. Abreu is a Senior Complex Litigation Attorney at the Sentinel Firm, APC, who received her Bachelor of Arts degree from Bryn Mawr College in 2014 and later received her Juris Doctorate from Southwestern Law School's SCALE Accelerated Two-Year Program in 2021. She was admitted to practice law before all courts in California in 2022. Ms. Abreu has exclusively focused on employment litigation since the beginning of her career at Moon & Yang, APC, specializing in labor and employment class action lawsuits involving various

violations of California labor laws. Ms. Abreu has litigated and mediated dozens of wage and hour class action lawsuits and has been appointed Class Counsel in numerous cases. Ms. Abreu is currently a Litigation associate in the Complex Litigation and Class Action Department at the Sentinel Firm where she continues to litigate wage and hour class action lawsuits. Ms. Abreu's billing rate has been approved at $650 in similar matters.

6. The Sentinel Firm, APC fully and actively participated in the litigation of the Action, including and not limited to, preparing the pleadings, case strategy, undertaking investigation, performing legal research, reviewing and analyzing thousands of pages of document production, conducting claims evaluation and analysis, and engaging in private mediation. Class Counsel have worked cooperatively to strategize and prosecute the Action. Ultimately, Class Counsel's efforts and Plaintiff's efforts have been successful in reaching the Settlement.

7. Plaintiff moves for an award of attorneys' fees to Class Counsel in the amount of $95,000.00, which is one-third of the escalated Gross Settlement Amount of $285,000.00. This is the amount which was requested at Preliminary Approval, and which is stated in the Settlement Agreement.

8. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in commencing and/or pursuing the Action; (2) the time, effort, and expense that Class Counsel dedicated to the Action; (3) the skill and determination that Class Counsel have shown; (4) the substantial results that Class Counsel have achieved throughout the litigation of the Action; (5) the value of the settlement that Class Counsel have achieved; and (6) the other cases that Class Counsel have turned down in order to devote their time and efforts to the Action.

9. My office has collectively spent at least 44.4 hours performing tasks to obtain a significant recovery on behalf of Plaintiff and the Class. At a blended firm-wide billing rate of $800.00 per hour, which is reasonable given the professional background experience and work performed on this matter, the lodestar for my offices totals more than $35,520. "[California] cases have ... implicitly approved use of a blended rate." (*569 East County Boulevard LLC v. Backcountry Against the Dump, Inc.* (2016) 6 Cal.App.5th 426, 438-440 fn 16.) The Time and Task Chart for our offices showing the time expended by our offices is attached as **Exhibit 1**.

10. I also anticipate that we will spend an additional 5 hours on this matter, appearing at the hearing of this motion, working with the administrator to process the Settlement, and preparing final accounting filings after distribution of the Settlement, for an additional lodestar of $3,000.00; I estimate our final lodestar to be $39,520.

11. In total, $21,297.53 in litigation costs incurred by my offices were necessary to successfully resolve this case. A true and correct copy of the invoice of our offices' litigation costs are attached as **Exhibit 2**.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed this _17_th day of August 2026, at Los Angeles, California.



SEUNG YANG

EXHIBIT 1

Date	Hours	Attorney	Description
1/11/2024	0.8	SY	Conduct Roberto Gomez Final Intake
1/11/2024	2.1	SY	Review docs from Roberto Gomez re: intake and prior cases/WC
1/12/2024	3	SY	meet with roberto gomez re: sigma cases; research on COA and entity info; sign LSA
1/24/2024	0.7	SY	refer case and info to LT re: co counseling; review materials and client docs
1/31/2024	0.3	SY	Review complaint and COA to be filed re: gomez
1/31/2024	0.4	SY	confer on paga letter
4/8/2024	0.5	SY	Review FAC/discuss strategy
5/2/2024	0.1	SY	email re: OC
6/10/2024	0.5	TH	assignment of sigma case; review answer
7/18/2024	0.2	TH	confer re discovery by LT
9/6/2024	0.2	TH	review CMC statement
9/16/2024	0.1	TH	f/u on CMC
9/26/2024	0.1	TH	discovery requests
11/12/2024	0.1	TH	email re: meet and confer
6/10/2024	2.5	TH	review client docs in sigma to get up to speed; review pleadings; discussion with SY
11/22/2024	0.2	SY	discussion re mediation on sigma gomez case
11/25/2024	0.5	SY	put out calls to mediators re open dates and fees on case
12/4/2024	0.4	TH	confer with co-counsel on mediation of gomez case; discuss with team internally
12/4/2024	0.2	SY	discuss mediation with TH/LT
3/6/2025	0.5	TH	Get notice of association prepped and on file
3/24/2025	0.2	JA	CMC statement
4/3/2025	0.1	TH	emails re class size
4/8/2024	0.4	TH	reach out to client and discuss mediation in June
4/22/2024	0.2	TH	further emails on mediation data required
4/21/2025	0.1	TH	email to OC re mediation data
4/30/2025	0.6	TH	multiple emails about mediation rescheduling; contact client re rescheduled mediation/engagement
7/21/2025	0.1	JA	joint statement review
7/25/2025	2.3	TH	confer with LT re damages analysis; start conducting damages analysis and modeling
8/5/2025	0.2	TH	f/u re mediation data
8/22/2025	3	JA	confer with LT on mediation brief; damages modeling and data analysis
8/22/2025	0.4	TH	LT confer re: mediation
8/28/2025	3	SY	confer with co-counsel; prepare for mediation; review materials and files/client docs
8/29/2025	7	TH	attend mediation with LT on gomez case; prep for mediation and review materials
8/29/2025	4.5	SY	Participate in mediation on sigma case
9/4/2025	0.7	TH	review SA from LT

9/18/2025	0.2	TH	final MOU
11/3/2025	0.4	JA	file joint stip per LT
11/4/2025	0.3	TH	F/U on SA
11/8/2025	0.6	SY	review final SA and sign
11/24/2025	0.5	SY	confer re: MPA and our decl; prep decl
12/8/2025	0.6	TH	Confer with LT on decl; follow up work on decl
12/8/2025	0.1	SY	confer with LT re decl
12/22/2025	1	JA	Review final MPA
2/5/2026	0.4	JA	finalize CMC statement and file
4/23/2026	0.3	TH	f/u on MPA hearing/tentative
7/27/2026	1.5	JJ	Email from LT re: gomez v. sigma case; review case file and start assembling decl and materials
8/17/2026	2.2	JJ	assemble the declaration for final approval; emails from LT
8/13/2026	0.1	JJ	email to LT re: gomez case
TOTAL TIME	44.4		

EXHIBIT 2

Date	Description	Rate ($)
1/31/2024	PAGA notice mailing fees	17.94
1/31/2024	PAGA notie LWDA submission fee	75
1/31/2024	Initial complaint filing and complex fee filing via OneLegal	1498.13
3/23/2024	Complaint and Summons service on Defendant process service fee via OneLegal	87.51
4/8/2024	First Amended Complaint mail service to Defendant fees	3.31
4/8/2024	First Amended Complaint court filing fee via OneLegal	20.68
4/8/2024	Proof of Service of Complaint and Summons court filing fee via OneLegal	20.68
9/6/2024	Joint CMC statement court fiing fee via OneLegal	20.8
9/6/2024	Joint CMC statement mail service to Defendant fees	2.31
3/6/2025	Joint stipulation to continue CMC and proposed order and Notice of Association of Counsel court filing fee via OneLegal	44.55
3/24/2025	Joint CMC statement court fiing fee via OneLegal	22.87
4/3/2025	Joint stipulation to continue CMC and proposed order	60
7/21/2025	Joint CMC statement court fiuling fee	60
7/30/2026	Notice of Ruling ourt filing fee	60
11/18/2025	Joint CMC statement court filing fee	60
12/22/2025	Preliminary approval motion court filing fee	60
2/5/2026	Joint CMC statement court filing fee	60
4/23/2026	Supplemental Declaration, Amended Proposed Order court filing fee	60
9/12/2026	Economic Damages Expert Fee	9,693.75
12/4/2024	Mediation Fee	9,250.00
	Final Approval Motion court filing fee	60
	Final Accounting Declaration court filing fee	60
Total		21297.53

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 707 Wilshire Blvd., Suite 4700 Los Angeles, CA 90017. On August 18, 2026, I served the foregoing document described as:

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

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

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

Attorneys for Defendant SIGMA COMPANIES INTERNATIONAL CORP.

[✓] **BY U.S. MAIL**: I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of 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.

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

Executed on August 20, 2026 at Glendale, California.

Ivette Hernandez
Name

Signature