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11 Attorneys for Plaintiff KARINA HUIZAR RODRIGUEZ,

12 as an individual and on behalf of all employees similarly situated

13
14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

15 **FOR THE COUNTY OF LOS ANGELES**

16 KARINA HUIZAR RODRIGUEZ, as an
17 individual and on behalf of all employees
18 similarly situated,

19 Plaintiff,

20 v.

21 TFC MANUFACTURING INC., a California
22 Corporation; and DOES 1 through 50,
23 inclusive,

24 Defendants.

Case No.: 24STCV02351

[Assigned for all purposes to Hon. Elihu M.
Berle]

**CLASS AND PAGA REPRESENTATIVE
ACTION**

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

Date: July 1, 2025

Time: 9 a.m.

Courtroom: Dept. 6

Judge: Hon. Elihu M. Berle

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1. I am admitted, in good standing, to practice as an attorney in the State of California, the United States District Courts for the Central, Eastern, Southern and Northern Districts of California. I am the founding partner at the law firm of The Sentinel Firm, APC. I am a fully qualified, adult resident of the State of California, and, if called as a witness herein, I would testify truthfully to the matters set forth herein. All of the matters set forth herein are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true. I am one of the attorneys of record for Plaintiff KARINA HUIZAR RODRIGUEZ (“Plaintiff”).

THE EXPERIENCE OF COUNSEL

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.

5. In 2010, I, along with my 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 aggrieved 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

1 plaintiffs and defendants) relating to employment matters, and have been appointed lead or co-lead
2 class counsel in hundreds of federal and state courts in California.

3 6. From 2010 to 2023, I assumed the role of Managing Partner at Moon & Yang, where my
4 primary duties included managing and growing the firm from 2 attorneys to over 20. During this
5 time, Moon & Yang became one of the largest plaintiff's firms in California that specialized in
6 wage and hour class action lawsuits. I was either the lead partner or assisted in the litigation and
7 settlement of hundreds of cases including class action and PAGA action cases.

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

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

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

1 10. From 2007 to 2016, I also served as a member of the Korean American Bar Association in
2 Southern California (“KABA”). In this capacity, I volunteered numerous hours advancing legal
3 issues affecting the Korean community in Southern California by translating for and assisting
4 members of the Korean immigrant community in pro bono clinics. From 2010 to 2014, I was on the
5 Board of Governors for KABA.

6 TIFFANY HYUN’S EXPERIENCE AND QUALIFICATIONS

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

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

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

19 14. During the course of her career, Ms. Hyun has managed hundreds of wage and hour class
20 and PAGA actions, and employment actions under the Fair Employment and Housing Act from
21 inception through resolution. Ms. Hyun has experience in various aspects of class action and PAGA
22 action litigation, including, but not limited to: drafting complaints and PAGA notice letters, drafting
23 and arguing motions, taking depositions, working with experts to analyze time and payroll data for
24 purposes of both settlement negotiations and contested class certification motions, drafting
25 mediation briefs and class-wide damages analyses, and mediating class action and PAGA action
26 cases. Ms. Hyun has participated in hundreds of mediations and has settled hundreds of wage and
27 hour class and/or PAGA actions. Ms. Hyun is a current member of the California Employment
28

1 Lawyers Association, and was selected by Super Lawyers as a Southern California Rising Star in
2 2021, 2022, 2024, and 2025.

3 15. My office is qualified to handle this litigation because we are experienced in litigating Labor
4 Code violations in individual, class, and PAGA actions. Including myself, The Sentinel Firm is
5 comprised of ten attorneys, all of whom are actively and continuously practicing employment
6 litigation, representing almost entirely employee plaintiffs, in individual, class, and PAGA actions,
7 in various state and federal jurisdictions throughout the State of California. The attorneys at my firm
8 have a high level of knowledge and experience in areas of wage and hour class actions, and labor
9 and employment law.

10 REASONABLENESS OF THE REQUESTED FEE AWARD

11 16. When this case was taken on a contingent fee basis, with the firm agreeing to assume
12 responsibility for litigation costs, the ultimate result was far from certain. In the course of this
13 litigation, the Sentinel Firm, APC paid filing fees, LexisNexus fees, copy charges and mailing,
14 telephone and mail charges. There was never a guarantee that the Sentinel Firm, APC, would
15 recoup those expenditures. The firm took on this case, which necessarily required the firm to forego
16 other opportunities, given finite resources to devote to cases.

17 17. Because of the uncertainty of the outcome in this and other wage and hour litigation
18 undertaken by The Sentinel Firm, APC, we took this case with the expectation that a risk
19 enhancement, either in the form of a lodestar multiplier or a percentage of the fund award
20 equivalent thereto, would be available if we prevailed. This expectation stems from the fact that
21 many cases we undertake as putative class actions do not resolve successfully.

22 18. Class Counsel's experience in employment class actions was integral in evaluating the
23 strengths and weaknesses of the case against Defendants and the reasonableness of the settlement.
24 Practice in the narrow fields of wage and hour litigation requires skill and knowledge concerning
25 the rapidly evolving substantive law (state and federal), as well as the procedural law of class action
26 litigation.

1 19. Just as the Court in *Chavez v. Netflix, Inc.*, 162 Cal. App. 4th 43, 66, n.11 (2008) observed,
2 it has been my experience, that attorney fee awards of one-third of a common settlement fund are
3 the rule, rather than the exception. Here, Class Counsel agrees that they will seek no more than one
4 third of the settlement amount in fees. This is consistent with common practice, consistent with
5 Ninth Circuit practice, consistent with California law approving the percentage of the fund method
6 to award fees from a common fund, *Laffitte v. Robert Half Intern. Inc.*, 1 Cal. 5th 480, 503 (2016),
7 and not inappropriate in light of the many hours expended by attorneys and paralegals performing
8 work for Plaintiffs before and after the filing of this matter. That work includes:

- 9 a. Numerous interviews with Plaintiff, Class Members and review of documents
10 provided by Plaintiff;
- 11 b. Investigation of the matter and exploring the corporate structure of Defendant;
- 12 c. Legal research and investigation regarding the Defendant's practices at numerous
13 points in the litigation;
- 14 d. Reviewing multiple drafts of the original complaint and finalization and filing of the
15 original complaint;
- 16 e. Extensive "meet and confer" efforts with Defendant's counsel to obtain relevant
17 documents and information through informal discovery;
- 18 f. Selecting a mediator and mediation date;
- 19 g. Reviewing and revising statements and stipulations;
- 20 h. Review of payroll and time data;
- 21 i. Review of Defendant's policy documents;
- 22 j. Working with opposing counsel for the receipt of a representative sampling and
23 analyzing the same with the aid of expert consultants and Plaintiff to perform
24 analyses of liability and exposure prior to attendance of the mediation, preparation of
25 a damages model with the aid of a statistics expert;
- 26 k. Analysis of the audit results and preparation of a damages model with the aid of a
27 statistics expert;

- l. Review and revisions to the damage model and supporting data analysis;
- m. Communicate with Plaintiff who requested updates or other information regarding this matter;
- n. Research and preparation of Plaintiff's mediation brief;
- o. Attendance at mediation;
- p. Reviewing multiple drafts of the class and PAGA Settlement Agreement and attachments and individual settlement and release agreements;
- q. Preparation of the motion for settlement approval; and,
- r. Review of edits to the motion for settlement approval and revisions to all documents to conform.

20. The actual lodestar incurred by Plaintiff's counsel The Sentinel Firm, APC is approximately \$39,990.00 to date. The breakdown of work by attorney is as follows:

Attorney	Time	Rate	Total
Seung Yang	12.9	\$850	\$10,965.00
Tiffany Hyun	38.7	\$750	\$29,025.00
	51.6	Total:	\$39,990.00

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed this 14th day of April 2025, at Los Angeles, California.

SEUNG YANG, "Declarant"

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, California 90071.

7 On the date indicated below, I served the document described as: **DECLARATION OF SEUNG**
8 **YANG IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS**
9 **AND PAGA REPRESENTATIVE ACTION SETTLEMENT** on the interested parties in this
action by sending a true copy thereof to interested parties as follows and as stated on the attached
service list:

10 Laurie M. Cortez
11 lauriecortez@emiliolaw.com
12 info@emiliolaw.com
13 Rachel Thomas
14 rachelthomas@emiliolaw.com
15 **EMILIO LAW GROUP, APC**
16 12832 Valley View Street, Suite 106
Garden Grove, California 92845
Tel: 714-379-6239
Fax: 714-379-5444

17 *Attorneys for Defendant TFC MANUFACTURING INC.*

18 [✓] **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to
19 accept electronic service, I caused the documents to be sent to the persons at the electronic
service addresses listed above via third-party cloud service **CASEANYWHERE**. I did not
receive an error message.

20 I declare under penalty of perjury under the laws of the State of California that the above is
21 true and correct.

22 Executed on April 14, 2025 at Glendale, California.

23 
24

25 KAREN ARELLANO

26 Name

27 Signature