

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

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

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

Plaintiff,

v.

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

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 PRELIMINARY APPROVAL OF
CLASS AND PAGA REPRESENTATIVE
ACTION SETTLEMENT**

Date: February 24, 2025

Time: 10 a.m.

Courtroom: Dept. 6

Judge: Hon. Elihu M. Berle

Action Filed: January 30, 2024

Trial: 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 of the Courts of the State of California and am one of the attorneys of record for Plaintiff Karina Huizar Rodriguez (“Plaintiff”) and the putative Class.

ADEQUACY OF THE SENTINEL FIRM, PC
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

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

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

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

23
24 9. I currently serve as a member of the California Employment Lawyers Association
25 (CELA). CELA is a statewide organization of approximately 1,200 attorneys who devote the majority of
26 their practices to representing employees in individual and class actions, including cases involving
27 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
2 in Southern California (“KABA”). In this capacity, I volunteered numerous hours advancing legal issues
3 affecting the Korean community in Southern California by translating for and assisting members of the
4 Korean immigrant community in pro bono clinics. From 2010 to 2014, I was on the Board of Governors
5 for KABA.
6

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

8 11. Tiffany Hyun graduated from the University of California, Irvine in 2010 with a
9 Bachelor of Arts degree in Global Cultures and Minor in English. Ms. Hyun received her Juris Doctor
10 degree from Loyola Law School in 2015. Ms. Hyun obtained her license to practice law from the
11 California State Bar in 2016.
12

13 12. From approximately 2017 to 2023, Ms. Hyun was employed as an associate attorney by
14 the law firm Lawyers for Justice, PC (“Lawyers for Justice”). At Lawyers for Justice, Ms. Hyun’s
15 practice focused entirely on wage and hour class actions and PAGA actions. During her time at
16 Lawyers for Justice, Ms. Hyun was involved in the litigation and settlement of hundreds of class and/or
17 PAGA actions.
18

19 13. Since approximately April of 2023, Ms. Hyun was employed as a senior associate
20 attorney at The Sentinel Firm. Ms. Hyun’s practice focuses almost exclusively on wage and hour class
21 actions and PAGA actions.
22

23 14. During the course of her career, Ms. Hyun has managed hundreds of wage and hour
24 class and PAGA actions, and employment actions under the Fair Employment and Housing Act from
25 inception through resolution. Ms. Hyun has experience in various aspects of class action and PAGA
26 action litigation, including, but not limited to: drafting complaints and PAGA notice letters, drafting
27 and arguing motions, taking depositions, working with experts to analyze time and payroll data for
28 purposes of both settlement negotiations and contested class certification motions, drafting mediation

1 briefs and class-wide damages analyses, and mediating class action and PAGA action cases. Ms. Hyun
2 has participated in hundreds of mediations and has settled hundreds of wage and hour class and/or
3 PAGA actions. Ms. Hyun is a current member of the California Employment Lawyers Association, and
4 was selected by Super Lawyers as a Southern California Rising Star in 2021, 2022, 2024, and 2025.

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

13
14 16. I submit that the Settlement is fair, reasonable, and adequate. In addition, the
15 Settlement is in the best interests of Plaintiff, Class Members, the State of California, and PAGA
16 Members.

17 17. I have no knowledge of any actual or potential conflict of interest with Simpluris, Inc.
18 which was selected by the Parties as a Settlement Administrator.

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

21
22 I declare under penalty of perjury under the laws of the State of California that the foregoing is
23 true and correct.

24 Executed on January 16, 2025, at Los Angeles, California.

25
26 

27
28 _____
Seung Yang

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 PRELIMINARY APPROVAL OF**
9 **CLASS 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 Cortez
11 lauriecortez@emiliolaw.com
12 Rachel Thomas
13 rachelthomas@emiliolaw.com
14 **EMILIO LAW GROUP**
12832 Valley View Street, Suite 106 Garden Grove, CA 92845
Telephone: (714) 379-6239
Facsimile: (714) 379-5444

15 **Attorneys for Defendant TFC Manufacturing, Inc.**

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

19
20 I declare under penalty of perjury under the laws of the State of California that the
above is true and correct. Executed on January 17, 2025 at Glendale, California.

21 Karen Arellano


