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Attorneys for Plaintiff KIMBERLY M. WILHELM,
as an individual and on behalf of all employees similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

KIMBERLY M. WILHELM, as an individual
and on behalf of all employees similarly
situated,

Plaintiff,

vs.

KEMPER SPORTS MANAGEMENT, LLC, a
Delaware Limited Liability Company;
KEMPER SPORTS MANAGEMENT
HOLDINGS, LLC, a Delaware Limited
Liability Company, and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 30-2024-01376524-CU-OE-CXC

[Assigned for All Purposes to:
Hon. David A. Hoffer, Dept. CX-103]

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

Date: January 26, 2026
Time: 1:30 p.m.
Courtroom: Dept. CX103
Judge: Hon. David A. Hoffer

Action Filed: January 30, 2024
Trial Date: Not Set

1 **DECLARATION OF SEUNG YANG**

2 I, Seung Yang, hereby declare as follows:

3 1. I am an attorney duly licensed to practice as such before all the Courts of the State of
4 California and am one of the attorneys of record for Plaintiff Kimberly M Wilhelm (“Plaintiff”) and the
5 putative Class.

6 2. I have personal knowledge of the matter set forth herein and could competently testify to the
7 facts described herein.

8 3. On September 15, 2025, in Department CX103 of the above-entitled Court, the Honorable
9 David Hoffer preliminarily approved the Settlement Agreement entered into between Plaintiff and
10 defendant Kemper Sports Management, LLC and defendant Sports Management Holdings, LLC.
11 (“Defendants”) and conditionally certified the Class for settlement purposes. The Court preliminarily
12 appointed Plaintiff as the representative of the Class (“Class Representative”). The Court also
13 preliminarily appointed and designated Tunyan Law, APC and The Sentinel Firm, APC as counsel for
14 the Class (together, “Class Counsel”). The Court approved and ordered sending of the court approved
15 Notice of Class Action Settlement, Exclusion Form and Objection Form, and adopted the notice, opt-
16 out, and objection procedures, and ordered their implementation. The Court appointed ILYM Group,
17 Inc. (“ILYM” or “Settlement Administrator”) to serve as Settlement Administrator for handling the
18 notice and settlement administration process.

19 **WORK PERFORMED BY CLASS COUNSEL**

20 4. Several attorneys at the Sentinel Firm, APC have been actively engaged in litigating this
21 matter since the inception of the above-captioned action (the “Action”), which was filed on January 30,
22 2024. Each member of the Sentinel Firm, APC is qualified to evaluate the risks and benefits of both
23 litigation and settlement in this matter and recommend this Settlement as fair and reasonable to the Class.
24 Because of the unique history and nature of our practice, all of the attorneys at the Sentinel Firm, APC
25 have a high level of knowledge and experience in labor and employment law. The following attorneys at
26 Sentinel Firm, APC spent significant time working on this matter

27 **Seung Yang** – I am the founder and Managing Partner of the Sentinel Firm, APC. I graduated
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1 from the University of California, San Diego in 2002 with a Bachelor of Arts degree in Political
2 Science and Minor in Law and Society. I received my Juris Doctor from Loyola Law School in
3 2006. I obtained my license to practice law from the California State Bar in June 2007. From
4 approximately 2007 to 2010, I began my legal career at the law firm of Lim, Ruger & Kim, LLP
5 (“LRK”), now known as LimNexus LLP, and worked as an associate in the litigation
6 department. At LRK, my practice consisted primarily of commercial litigation and employment
7 defense work. In 2010, I, along with a prior partner, formed Moon & Yang, APC (“Moon
8 & Yang”). Initially, our practice was focused on commercial litigation and employment defense
9 work. In 2014, Moon & Yang stopped taking defense work, and instead became a plaintiff’s
10 firm, representing employees who traditionally did not have the financial means to participate in
11 the legal system. Moon & Yang and its attorneys have tried both bench and jury trials
12 (representing both plaintiffs and defendants) relating to employment matters and was appointed
13 lead or co-lead class counsel in hundreds of federal and state courts in California. From 2010 to
14 2023, I assumed the role of Managing Partner at Moon & Yang, where my primary duties
15 included managing and growing the firm from 2 attorneys to over 20. During this time, Moon &
16 Yang became one of the largest plaintiff’s firms in California that specialized in wage and hour
17 class action lawsuits. I was either the lead partner or assisted in the litigation and settlement of
18 hundreds of cases including class action and PAGA action cases. In the Summer of 2023, I sold
19 my ownership interest in Moon & Yang to create a new firm, The Sentinel Firm, APC (“The
20 Sentinel Firm”). Since its inception, The Sentinel Firm has focused exclusively on the
21 prosecution of plaintiff-side employment cases as well as personal injury cases. In addition to the
22 present case, The Sentinel Firm are the attorneys of record in over a hundred employment-
23 related putative wage-and-hour class action lawsuits pending in state and federal jurisdictions
24 through the State of California. During this relatively short time, The Sentinel Firm have
25 recovered millions of dollars on behalf of thousands of employees in the State of California.
26 Throughout my career, I have represented thousands of individuals in employment cases under
27 the Fair Employment and Housing Act and those involving wage and hour claims, and in
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1 personal injury cases and have been named Class Counsel in dozens of cases. I have litigated
2 both federal and state employment discrimination cases from intake through the trial,
3 successfully opposed voluminous motions for summary judgment, and has participated in
4 hundreds of highly effective mediations that resulted in six and seven-figure settlements. In
5 recognition of his professional achievements, I was selected by Super Lawyers as a Rising Star
6 from 2018 – 2020 and recognized by The National Trial Lawyers as one of the Top 100 Trial
7 Lawyers in California, amongst other achievements. I currently serve as a member of the
8 California Employment Lawyers Association (CELA). CELA is a statewide organization of
9 approximately 1,200 attorneys who devote the majority of their practices to representing
10 employees in individual and class actions, including cases involving unpaid wages,
11 discrimination, harassment, retaliation and whistleblowing. From 2007 to 2016, I also served as a
12 member of the Korean American Bar Association in Southern California (“KABA”). In this
13 capacity, I volunteered numerous hours advancing legal issues affecting the Korean community
14 in Southern California by translating for and assisting members of the Korean immigrant
15 community in pro bono clinics. From 2010 to 2014, I was on the Board of Governors for KABA.

16 **Tiffany Hyun** – Ms. Hyun serves as Class Action Lead Counsel for the Sentinel Firm, APC, and
17 have continuously served in this position at the Sentinel Firm, APC since approximately April of
18 2024. Ms. Hyun graduated from the University of California, Irvine in 2010 with a Bachelor of
19 Arts degree in Global Cultures and Minor in English. Ms. Hyun received her Juris Doctor degree
20 from Loyola Law School in 2015. She obtained her license to practice law from the California
21 State Bar in 2016. From approximately 2017 to 2024, Ms. Hyun was employed as an associate
22 attorney by the law firm Lawyers for Justice, PC (“Lawyers for Justice”). At Lawyers for Justice,
23 Ms. Hyun’s practice focused entirely on wage and hour class actions and PAGA actions. During
24 her time at Lawyers for Justice, Ms. Hyun was involved in the litigation and settlement of
25 hundreds of class and/or PAGA actions. Currently, Ms. Hyun’s practice focuses almost
26 exclusively on Plaintiff’s side wage and hour class actions and PAGA actions. During the
27 course of her career, she has managed hundreds of wage and hour class and PAGA actions, and
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1 employment actions under the Fair Employment and Housing Act from inception through
2 resolution. Ms. Hyun has experience in various aspects of class action and PAGA action
3 litigation, including, but not limited to: drafting complaints and PAGA notice letters, drafting
4 and arguing motions, taking depositions, working with experts to analyze time and payroll data
5 for purposes of both settlement negotiations and contested class certification motions, drafting
6 mediation briefs and class wide damages analyses, and mediating class action and PAGA action
7 cases. Ms. Hyun has participated in hundreds of mediations and has settled hundreds of wage
8 and hour class and/or PAGA actions and have been named Class and/or PAGA counsel in
9 dozens of actions. Ms. Hyun is a current member of the California Employment Lawyers
10 Association, and was selected by Super Lawyers as a Southern California Rising Star in 2021,
11 2022, 2024, and 2025.

12 **Jessica Abreu** - Ms. Abreu received her Bachelor of Arts degree from Bryn Mawr College in
13 2014 and later received her Juris Doctorate from Southwestern Law School's SCALE
14 Accelerated Two-Year Program in 2021. She was admitted to practice law before all courts in
15 California in 2022. Ms. Abreu has exclusively focused on employment litigation since the
16 beginning of her career at Moon & Yang, APC, specializing in labor and employment class
17 action lawsuits involving various violations of California labor laws. Ms. Abreu has litigated and
18 mediated dozens of wage and hour class action lawsuits and has been appointed Class Counsel in
19 numerous cases. Ms. Abreu is currently a Litigation associate in the Complex Litigation and
20 Class Action Department at the Sentinel Firm where she continues to litigate wage and hour
21 class action lawsuits.

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

6. Plaintiff moves for an award of attorneys' fees to Class Counsel in the amount of \$500,000.00 which is thirty-three and one third percent (33.333333%) of the Gross Settlement Amount of \$1,500,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class Counsel, Plaintiff has agreed to a contingency fee of at least thirty-three and one third percent (33.333333%) of the recovery.

7. 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.

8. The actual lodestar incurred by Plaintiff's counsel The Sentinel Firm, APC is approximately \$53,500.00 to date. The breakdown of work by attorney is as follows:

Attorney	Time	Rate	Total
Seung Yang	36.8	\$750	\$27,600.00
Tiffany Hyun	36.4	\$625	\$22,750.00
Jessica Abreu	7.0	\$450	\$3,150.00
	80.2	Total:	\$53,500.00

Attached hereto as **Exhibit A** is task and time chart that sets forth in detail the nature of the legal services provided by attorneys and the time incurred in performing those services.

9. 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.

1 I declare under penalty of perjury, under the laws of the State of California, that the foregoing is
2 true and correct. Executed this 6th day of January 2025, at Los Angeles, California.

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5
6 SEUNG YANG

Exhibit “A”

Date	Hours	Atty	Description
1/17/2024	3.2	SY	Review the case with client and go over the representation agreement and discuss duties of a class rep and litigation activities; discuss factual scenario surrounding case and potential strategies
1/19/2024	4.8	SY	Review case against Kemper Sports Management; research into potential liabilities and evaluate suitability for representation; research into business organizations and other lawsuits; prepare outline of case management plan and discovery plan
1/22/2024	2.8	SY	Review of the client docs which were provided by the client relating to case against Kemper Sports; index and review; determine relevance; research into Kemper Sports to prepare for discussion with co-counsel re: kemper sports matter
1/25/2024	1.6	SY	Draft correspondence to LT re: co-counseling and advising of case specifics and corporate structure - research into employee counts and suitability for class action
1/26/2024	0.4	SY	Prepare a JPA for review by client; have finalized and sent to client
1/29/2024	3.6	SY	Review the Complaint to be filed in the Kemper Sports case and the PAGA letter; suggest revisions
1/29/2024	0.2	SY	Review representation letter from LT to client re: JPA and litigation activities
3/8/2024	0.9	SY	Review Defendant's answer; research re: affirmative defenses and issues surrounding obtaining class cert in this case
3/12/2024	1.6	SY	Review the notice of removal in this matter and determine basis for remand; discussion with SY; legal research on remand issues and impact on case flow

4/22/2024	4.7 TH	Review the FAC adding additional claim and additional cause of action; edits and revisions; review Kemper Sports case to get up to speed on various issues presented by case; discussions with SY re: handling Kemper sports matter and case flow
4/22/2024	0.9 SY	Discuss Kemper Sports case with TH and hold case strategy meeting re: handling case going forward and coordinating with co-counsel
5/7/2024	2.7 TH	Discussion re: mediation with Steve Rottman and mediation data request including specifics of data sampling and specific docs required; review email from LT re: mediation data request
5/7/2024	0.7 SY	Discussion with TH re: mediators and using Rottman to mediate Kemper Sports matter; review of case to date and potential for settlement; case map
7/10/2024	0.3 TH	Review status of federal proceedings and consider litigation strategy.
8/5/2024	0.7 SY	Review attachments for Wilhelm case regarding factual scenario regarding employment with Defendant
9/17/2024	0.2 TH	Correspondence with co-counsel re mediation.
9/17/2024	0.2 SY	Correspondence with co-counsel re mediation.
11/10/2024	0.4 TH	Review Notice of Appearance in Federal Court and review necessary rules and provisions re: notice of appearance and effect on matter
12/4/2024	1.1 TH	Strategize re mediation and pending class certification motion with co-counsel; preparation for call with co-counsel on class cert and discovery issues
12/20/2024	3.2 TH	Review Plaintiff's various outgoing written discovery requests; refer to case map plan.
1/3/2025	0.1 TH	Correspondence with co-counsel and defendant re mediation.
1/15/2025	0.3 TH	Conference with co-counsel re strategy for mediation.

1/15/2025	0.3 SY	Conference with co-counsel re strategy for mediation.
1/17/2025	3.6 TH	Review mediation materials, damages analysis, case strategy; prepare for all-day mediation
1/17/2025	1.7 SY	Review mediation materials and case valuation
1/18/2025	9 TH	Attend mediation
1/18/2025	9 SY	Attend mediation
1/24/2025	1.2 TH	Review draft MOU
1/27/2025	1.5 SY	Review settlement terms with client and LT; get circulated to client for final sigs; prepare for meeting with client; discussion with LT
1/28/2025	0.4 TH	Correspondence with co-counsel regarding MOU; research into MOU provisions and suggested additions
2/25/2025	0.5 TH	Review proposed class notice re: settlement/MPA
2/28/2025	0.1 TH	Review Chief Judge's Order re: Kemper Sports case
3/5/2025	0.2 TH	correspondence with co-counsel regarding execution of settlement agreement and admin re same.
3/5/2025	0.2 TH	Get the SA sent over to client for sigs; locate client; follow up with KA re: client sigs
3/14/2025	0.7 TH	Review stipulation to remand.
3/21/2025	0.2 TH	Review the Remand Order issued by Court and determine necessary follow up procedures.
3/27/2025	0.7 TH	Follow up with Client re: signature in connection with MPA; discuss with client and explain agreement issues
3/27/2025	0.4 SY	Revision to SA; get sent to client; review and sign
3/27/2025	0.3 TH	Coordinate with KA and LT re: getting client sigs
4/9/2025	2.7 TH	Review draft motion for preliminary approval.
4/9/2025	2.5 TH	Review draft of MPA and offer suggestions; legal research into points and research on judge's requirements for granting MPA

7/24/2025	3.3 JA	Draft declaration ISO MPA, review settlement documents; discussion with TH re: case details and get up to speed on what needs to be done re: MPA
7/24/2025	1.3 SY	Update the draft declaration ISO MPA; review case materials and files; discuss issues with JA.
7/24/2025	0.4 TH	Meeting with JA re: Kemper Sports Management case and new assignments for MPA process
8/1/2025	0.2 TH	correspondence with co-counsel re amendment to settlement agreement.
8/4/2025	0.3 SY	Review the Amendment to the Settlement Agreement per MPA
8/8/2025	0.4 TH	Review co-counsel's supplemental declaration and exhibit for filing.
10/2/2025	0.1 TH	Review notice of ruling for filing.
12/23/2025	0.7 SY	Review MPA order and draft declaration in support of final approval.
12/23/2025	1.3 JA	Review MPA order and prepare draft declaration in support of final approval; review exhibits and prepare for MFA
12/24/2025	0.3 JA	Teams discussion with JJ re: exhibit prep and advisement re: what we need on MFA
1/5/2026	1.6 JA	Correspondence with LT re: MFA and continue working on getting declaration prepared for MFA; review of MFA docs; discussion with JJ re: preparing LFA and getting up to speed on case info
1/5/2026	0.5 JA	Prepare and format exhibits for MFA declarations; further email with TH and JJ re: exhibit prep

Total: 80.2

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
7 Los Angeles, CA 90071.

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

13 **SEYFARTH SHAW LLP**

14 Michael J. Burns

15 mburns@seyfarth.com

16 Andrew M. McNaught

17 amcnaught@seyfarth.com

18 560 Mission Street, 31st Floor
19 San Francisco, California 94105

20 Telephone:(415) 397-2823

21 Facsimile:(415) 397-8549

22 **SEYFARTH SHAW LLP**

23 Laura E. Heyne

24 lheyne@seyfarth.com

25 2029 Century Park East, Suite 3500

26 Los Angeles, CA 90067-3021

27 Telephone: (310) 277-7200

28 Facsimile: (310) 201-5219

Attorneys for Defendants KEMPER SPORTS MANAGEMENT, LLC, KEMPER SPORTS
MANAGEMENT HOLDINGS, LLC

20 [✓] **BY E-MAIL:** I hereby certify that this document was served from Glendale, California, by e-
21 mail delivery on the parties listed herein at their most recent known e-mail address or e-mail
22 of record in this action.

23 [✓] **BY ELECTRONIC SERVICE:** Based on an agreement of the parties to accept electronic service, I
24 caused the documents to be sent to the persons at the electronic service addresses listed above via
25 electronic mail. I did not receive an error message.

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

28 Executed on January 6, 2026 at Los Angeles, California.

Ivette Hernandez

Name

Signature