

Lilit Tunyan (SBN 329351)  
[ltunyan@tunyanlaw.com](mailto:ltunyan@tunyanlaw.com)  
Artur Tunyan (SBN 349174)  
[atunyan@tunyanlaw.com](mailto: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](mailto:seung.yang@thesentinel-firm.com)  
Tiffany Hyun (SBN 311743)  
[tiffany.hyun@thesentinel-firm.com](mailto: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 KIMBERLY M. WILHELM,  
as an individual and on behalf of all employees similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF ORANGE**

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

Plaintiff,

v.

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. Randall J.  
Sherman, Dept. CX105]

**CLASS AND PAGA REPRESENTATIVE  
ACTION**

**DECLARATION OF PLAINTIFF KIMBERLY  
M. WILHELM IN SUPPORT OF  
PLAINTIFF'S MOTION FOR APPROVAL OF  
CLASS AND PAGA REPRESENTATIVE  
ACTION SETTLEMENT**

Reservation N: 74532524

Date: July 25, 2025

Time: 10 a.m.

Courtroom: Dept. CX105

Judge: Hon. Randall J. Sherman

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

2

3  
4  
5  
6

## 7

8  
90  
1  
2

## 2

4  
5  
6  
7  
8  
9  
0  
1

2  
3  
4  
5

6  
7  
8

1 7. I am asking to be stand-in for other employees of Defendants. Because of that, I cannot  
2 quit on the Class, and I cannot put myself and my interests before the Class. I accept these duties and  
3 request that I be approved as the class representative for purposes of this Settlement.

4 COMMUNITY OF INTEREST: TYPICALITY AND ADEQUACY

5 8. I was an hourly non-exempt employee of Defendants and was subject to the same pay  
6 structure and rules as all the other hourly non-exempt employees of Defendants.

7 9. I am not aware of anything special about me that would raise unique defenses to my claims, as  
8 opposed to the claims of the class. I am also not suing for anything unique to me. Rather, my claims are  
9 based upon the same facts that relate to the rest of the Class.

10 10. I do not believe that I have any conflicts with Class Members included in this proposed  
11 Settlement. I do not have any intention to take any action that would place me in a position that is  
12 hostile to other Class Members.

13 SERVICE AS A CLASS REPRESENTATIVE

14 11. I believe if not for my stepping forward and taking on the duties of protecting the  
15 interests all aggrieved former and current employees of Defendants, it is likely that the interests of the  
16 Class would neither have been prosecuted, nor benefited. To my knowledge, other than the litigation  
17 encompassed by this proposed Settlement, there is no other litigation, on a Class basis, concerning the  
18 claims in this lawsuit nor have Defendants pointed to any.

19 12. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy to  
20 search for information online these days, I will face an increased risk that future employers will  
21 discover information about this lawsuit online and have a negative reaction to learning that I sued an  
22 employer. This may make it harder for me to obtain future employment or change jobs for a better  
23 opportunity.

24 13. I have devoted a substantial amount of my time, both before this lawsuit was filed and  
25 also during its litigation, to ensure a fair result for the employee Class. This involved ongoing  
26 communication and participation with my Counsel during the course of this case. My participation  
27 began with bringing certain issues that are involved in this matter to my Counsel's attention and  
28 explaining the factual background that was used to prosecute the claims in this case. For example, I

1 reviewed documents which I already had, I provided relevant documents to my Counsel, and I  
2 explained those documents and related facts to my Counsel to assist them in their review during  
3 multiple meetings with my attorneys.

4 14. My efforts continued after the suit was filed. For example, I have had many discussions  
5 with the attorneys regarding Defendants' wage and hour policies, my claims in this case, litigation  
6 strategy, updates on how the case was proceeding, and how I could help the case. I also discussed  
7 strategy with my Counsel. I remained in regular communication with my attorneys regarding discovery  
8 and settlement discussions that the parties had during the course of litigation and mediation. I provided  
9 substantial information and documents to my attorneys to assist them in preparing the case.

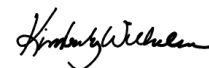
10 15. After the mediation, a long-form settlement agreement was negotiated, and I reviewed it  
11 with my Counsel to ensure that its terms are likewise fair and adequate.

12 16. I believe that the Class Representative Service Payment is fair and reasonable. This  
13 enhancement takes into consideration the time, effort, risks, stress as well as the benefit provided to all  
14 class members as a result of my involvement in this litigation. In sum, in addition to assuming the risks  
15 that go along with being a class representative and named plaintiff in litigation, I believe I have also  
16 provided well over 25 hours of my time during the course of this litigation to ensure a good outcome  
17 for the best interests of the Class. I believe I have been diligent and acted above and beyond that which  
18 is expected of a Class Representative throughout all stages of the litigation. I will continue to diligently  
19 act as the Class Representative up to and including final approval of the Class Action Settlement.  
20

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

23 Executed 03 / 27 / 2025

at Irvine, California.

24 

25  
26 **KIMBERLY M. WILHELM, "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  
6 18 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 PLAINTIFF**  
9 **KIMBERLY M. WILHELMIN SUPPORT OF PLAINTIFF'S MOTION FOR APPROVAL OF**  
10 **CLASS AND PAGA REPRESENTATIVE ACTION SETTLEMENT** on the interested parties in  
11 this action by sending a true copy thereof to interested parties as follows and as stated on the  
12 attached service list:

13 **SEYFARTH SHAW LLP**

14 Michael J. Burns

15 [mburns@seyfarth.com](mailto:mburns@seyfarth.com)

16 Andrew M. McNaught

17 [amcnaught@seyfarth.com](mailto: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](mailto: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,  
21 by e-mail delivery on the parties listed herein at their most recent known e-mail address  
22 or e-mail of record in this action.

23 [✓] **BY ELECTRONIC SERVICE:** Based on an agreement of the parties to accept electronic  
24 service, I caused the documents to be sent to the persons at the electronic service addresses listed  
25 above via 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  
27 and correct.

28 Executed on April 10, 2025 at Los Angeles, California.

Karen Arellano

Name

Signature