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Attorneys for Plaintiff NATHAN TAMAAIGA NELSON,
as an individual and on behalf of all employees similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

NATHAN TAMAAIGA NELSON, as an
individual and on behalf of all employees
similarly situated,

Plaintiff,

v.

CHINESE GOURMET GROUP, INC., a
California Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 24STCV04383

[Assigned for all purposes to Hon. William F.
Highberger]

**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: April 13, 2026
Time: 2 p.m.
Courtroom: Dept. 10
Judge: Hon. William F. Highberger

Action Filed: February 22, 2024
Trial Date: Not Set Date:

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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 NATHAN TAMAAIGA NELSON (“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.

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 my primary duties included managing and growing the firm from 2 attorneys to over

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

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

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

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

27 10. From 2007 to 2016, I also served as a member of the Korean American Bar
28 Association in Southern California ("KABA"). In this capacity, I volunteered numerous hours

1 advancing legal issues affecting the Korean community in Southern California by translating
2 for and assisting members of the Korean immigrant community in pro bono clinics. From
3 2010 to 2014, I was on the Board of Governors for KABA.

4 **TIFFANY HYUN'S EXPERIENCE AND QUALIFICATIONS**

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

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

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

17 14. During the course of her career, Ms. Hyun has managed hundreds of wage and
18 hour class and PAGA actions, and employment actions under the Fair Employment and
19 Housing Act from inception through resolution. Ms. Hyun has experience in various aspects of
20 class action and PAGA action litigation, including, but not limited to: drafting complaints and
21 PAGA notice letters, drafting and arguing motions, taking depositions, working with experts
22 to analyze time and payroll data for purposes of both settlement negotiations and contested
23 class certification motions, drafting mediation briefs and class wide damages analyses, and
24 mediating class action and PAGA action cases. Ms. Hyun has participated in hundreds of
25 mediations and has settled hundreds of wage and hour class and/or PAGA actions. Ms. Hyun
26 is a current member of the California Employment Lawyers Association, and was selected by
27 Super Lawyers as a Southern California Rising Star in 2021, 2022, 2024, and 2025.

28 15. My office is qualified to handle this litigation because we are experienced in

1 litigation Labor Code violations in individual, class, and PAGA actions. Including myself, The
2 Sentinel Firm is comprised of ten attorneys, all of whom are actively and continuously
3 practicing employment litigation, representing almost entirely employee plaintiffs, in
4 individual, class, and PAGA actions, in various state and federal jurisdictions throughout the
5 State of California. The attorneys at my firm have a high level of knowledge and experience in
6 areas of wage and hour class actions, and labor and employment law.

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

10 17. I have no knowledge of any actual or potential conflict of interest with Phoenix
11 Class Action Administration Solutions which was selected by the Parties as a Settlement
12 Administrator.

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

15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct.

17 Executed on January 27, 2026, at Los Angeles, California.



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Seung Yang, Esq., 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
Los Angeles, CA 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 Margaret A. Sedy
11 m@sedylaw.com
12 **LAW OFFICE OF MARGARET A. SEDY**
13 9171 Wilshire Blvd., Suite 500
Beverly Hills, CA 90210
El Segundo, CA 90245-4617
Telephone: 310-893-5509

14 *Attorneys for Defendant CHINESE GOURMET GROUP, INC.*

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

21 Executed on January 27, 2026 at Los Angeles, California.

22
23 Ivette Hernandez

24 Name

25 _____
26 Signature