

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 JESUS GUZMAN,
as an individual and on behalf of all
employees similarly situated

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

JESUS GUZMAN, as an individual and on
behalf of all employees similarly situated,

Plaintiff,

vs.

CORE ENVIRONMENTAL SOLUTIONS, a
California Corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 24STCV03593

[Assigned for All Purposes to:
Hon. Theresa M. Traber]

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

Date: October 10, 2025
Time: 10:30 a.m.
Courtroom: Dept. 1
Judge: Hon. Theresa M. Traber

Action Filed: February 13, 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 Jesus Guzman ("Plaintiff") and the putative
5 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 April 22, 2025, in Courtroom 1 of the above-entitled Court, the Honorable Stuart M. Rice
9 preliminarily approved the Settlement Agreement entered into between Plaintiff and defendant Core
10 Environmental Solutions ("Defendant") and conditionally certified the Class for settlement purposes.
11 The Court preliminarily appointed Plaintiff as the representative of the Class ("Class Representative").
12 The Court also preliminarily appointed and designated Tunyan Law, APC and The Sentinel Firm, APC
13 as counsel for the Class (together, "Class Counsel"). The Court approved and ordered the mailing of the
14 court approved Notice of Class Action Settlement ("Class Notice"), and adopted the notice, opt-out, and
15 objection procedures, and ordered their implementation. The Court appointed ILYM Group, Inc.
16 ("ILYM" or "Settlement Administrator") to serve as Settlement Administrator for handling the notice
17 and settlement administration process.

18 **WORK PERFORMED BY CLASS COUNSEL**

19 4. Several attorneys at the Sentinel Firm, APC have been actively engaged in litigating this
20 matter since the inception of the above-captioned action (the "Action"), which was filed on February 13,
21 2024.

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, performing
24 legal research, propounding and responding to numerous sets of formal discovery, reviewing and
25 analyzing thousands of pages of document production, conducting claims evaluation and analysis, and
26 engaging in private mediation. Class Counsel have worked cooperatively to strategize and prosecute the
27 Action. Ultimately, Class Counsel's efforts and Plaintiff's efforts have been successful in reaching the
28

1 Settlement.

2 6. Plaintiff moves for an award of attorneys' fees to Class Counsel in the amount of \$51,666.67
3 which is thirty-three and one third percent (33.333333%) of the Gross Settlement Amount of
4 \$155,000.00. Pursuant to the contingency-fee agreement entered into by and between Plaintiff and Class
5 Counsel, Plaintiff has agreed to a contingency fee of at least thirty-three and one third percent
6 (33.333333%) of the recovery.

7 7. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel took in
8 commencing and/or pursuing the Action; (2) the time, effort, and expense that Class Counsel dedicated to
9 the Action; (3) the skill and determination that Class Counsel have shown; (4) the substantial results that
10 Class Counsel have achieved throughout the litigation of the Action; (5) the value of the settlement that
11 Class Counsel have achieved; and (6) the other cases that Class Counsel have turned down in order to
12 devote their time and efforts to the Action.

13 8. The actual lodestar incurred by Plaintiff's counsel The Sentinel Firm, APC is approximately
14 **\$29,525.00** to date. The breakdown of work by attorney is as follows:

Attorney	Time	Rate	Total
Seung Yang	11.7	\$750	\$8,775.00
Tiffany Hyun	33.2	\$625	\$20,750.00
	44.9	Total:	\$29,525.00

19
20 9. I also anticipate that we will spend an additional 5 hours on this matter, appearing at the
21 hearing of this motion, working with the administrator to process the Settlement, and preparing final
22 accounting filings after distribution of the Settlement, for an additional lodestar of \$3,000.00.

23 I declare under penalty of perjury, under the laws of the State of California, that the foregoing is
24 true and correct. Executed this 8th day of September 2025, at Los Angeles, California.

25
26 

27 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 LILIT**
8 **TUNYAN 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 Seth Weisburst
11 sweisburst@grsm.com
12 Christopher Keller
13 ckeller@grsm.com
14 Vanessa Santellan
15 vsantellan@grsm.com

13 **GORDON REES SCULLY MANSUKHANI, LLP**
14 275 Battery Street, Suite 2000 San Francisco, California 94111
15 Telephone: (415) 986-5900
Facsimile: (415) 986-8054

16 **Attorneys for Defendant CORE ENVIRONMENTAL SOLUTIONS**

17 [✓] **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to
18 accept electronic service, I caused the documents to be sent to the persons at the electronic
19 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. Executed on September 8, 2025 at Glendale, California.

22
23 KAREN ARELLANO _____
24
25
26
27
28