

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 OLIVIA PASS

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

OLIVIA PASS, and HADIZA JIMADA, as
individuals, and on behalf of all employees
similarly situated,

Plaintiffs,

v.

DEL AMO HOSPITAL, INC., a California
Corporation; UHS OF DELAWARE, INC., a
Delaware corporation; DEL AMO
BEHAVIORAL HEALTH SYSTEM, an
unknown business entity; DEL AMO
BEHAVIORAL HEALTH SYSTEM OF
CALIFORNIA, an unknown business entity
and DOES 1 through 50, inclusive,

Defendants.

Case No.: 24STCV03085

[Assigned for all purposes to Hon. William E.
Weinberger, Dept. 37]

**DECLARATION OF SEUNG YANG IN
SUPPORT OF PLAINTIFFS' MOTION FOR
AN ORDER APPROVING SETTLEMENT
OF CLAIMS BROUGHT PURSUANT TO
THE PRIVATE ATTORNEY GENERAL'S
ACT OF 2004**

Reservation ID: 476005153224

Date: May 26, 2026

Time: 8:30 a.m.

Courtroom: Dept. 37

Judge: Hon. William E. Weinberger

Action Filed: February 5, 2024

Trial Date: 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 admitted, in good standing, to practice as an attorney in the State of California, the United States District Courts for the Central, Eastern, Southern and Northern Districts of California. I am the founding partner at the law firm of The Sentinel Firm, APC. I am a fully qualified, adult resident of the State of California, and, if called as a witness herein, I would testify truthfully to the matters set forth herein. All of the matters set forth herein are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true. I am one of the attorneys of record for Plaintiff OLIVIA PASS (“Plaintiff”).

THE EXPERIENCE OF COUNSEL

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.

5. In 2010, I, along with my prior partner, formed Moon & Yang, APC (“Moon & Yang”). Initially, my practice was focused on commercial litigation and employment defense work. In 2014, Moon & Yang stopped taking defense work, and instead became a plaintiff’s firm, representing aggrieved employees who traditionally did not have the financial means to participate in the legal system. Moon & Yang and its attorneys have tried both bench and jury trials (representing both plaintiffs and defendants) relating to employment matters, and have

1 been appointed lead or co-lead class counsel in hundreds of federal and state courts in California.

2 6. From 2010 to 2023, I assumed the role of Managing Partner at Moon & Yang, where
3 my primary duties included managing and growing the firm from 2 attorneys to over 20. During this
4 time, Moon & Yang became one of the largest plaintiff's firms in California that specialized in wage
5 and hour class action lawsuits. I was either the lead partner or assisted in the litigation and
6 settlement of hundreds of cases including class action and PAGA action cases.
7

8 7. In the Summer of 2023, I sold my ownership interest in Moon & Yang to create a new
9 firm, The Sentinel Firm, APC. ("The Sentinel Firm"). Since its inception, The Sentinel Firm has
10 focused exclusively on the prosecution of plaintiff-side employment cases as well as personal
11 injury cases. In addition to the present case, we are the attorneys of record in over a hundred
12 employment-related putative wage-and-hour class action lawsuits pending in state and federal
13 jurisdictions through the State of California. During this relatively short time, we have
14 recovered millions of dollars on behalf of thousands of employees in the State of California.
15

16 8. Throughout my career, I have represented thousands of individuals in
17 employment cases under the Fair Employment and Housing Act and those involving wage and
18 hour claims, and in personal injury cases. I have litigated both federal and state employment
19 discrimination cases from intake through the trial, successfully opposed voluminous motions
20 for summary judgment, and have participated in hundreds of highly effective mediations that
21 resulted in six and seven-figure settlements. In recognition of my professional achievements, I
22 was selected by SuperLawyers as a Rising Star from 2018 – 2020 and recognized by The
23 National Trial Lawyers as one of the Top 100 Trial Lawyers in California, amongst other
24 achievements.
25

26 9. I currently serve as a member of the California Employment Lawyers Association
27 (CELA). CELA is a statewide organization of approximately 1,200 attorneys who devote the majority of
28

1 their practices to representing employees in individual and class actions, including cases involving
2 unpaid wages, discrimination, harassment, retaliation and whistleblowing.

3 10. From 2007 to 2016, I also served as a member of the Korean American Bar Association
4 in Southern California (“KABA”). In this capacity, I volunteered numerous hours advancing legal issues
5 affecting the Korean community in Southern California by translating for and assisting members of the
6 Korean immigrant community in pro bono clinics. From 2010 to 2014, I was on the Board of Governors
7 for KABA.
8

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

10 11. Tiffany Hyun graduated from the University of California, Irvine in 2010 with a
11 Bachelor of Arts degree in Global Cultures and Minor in English. Ms. Hyun received her Juris Doctor
12 degree from Loyola Law School in 2015. Ms. Hyun obtained her license to practice law from the
13 California State Bar in 2016.
14

15 12. From approximately 2017 to 2024, Ms. Hyun was employed as an associate attorney by
16 the law firm Lawyers for Justice, PC (“Lawyers for Justice”). At Lawyers for Justice, Ms. Hyun’s
17 practice focused entirely on wage and hour class actions and PAGA actions. During her time at
18 Lawyers for Justice, Ms. Hyun was involved in the litigation and settlement of hundreds of class and/or
19 PAGA actions.
20

21 13. Since approximately April of 2024, Ms. Hyun was employed as a senior associate
22 attorney at The Sentinel Firm. Ms. Hyun’s practice focuses almost exclusively on wage and hour class
23 actions and PAGA actions.

24 14. During the course of her career, Ms. Hyun has managed hundreds of wage and hour
25 class and PAGA actions, and employment actions under the Fair Employment and Housing Act from
26 inception through resolution. Ms. Hyun has experience in various aspects of class action and PAGA
27 action litigation, including, but not limited to: drafting complaints and PAGA notice letters, drafting
28

1 and arguing motions, taking depositions, working with experts to analyze time and payroll data for
2 purposes of both settlement negotiations and contested class certification motions, drafting mediation
3 briefs and class-wide damages analyses, and mediating class action and PAGA action cases. Ms. Hyun
4 has participated in hundreds of mediations and has settled hundreds of wage and hour class and/or
5 PAGA actions. Ms. Hyun is a current member of the California Employment Lawyers Association, and
6 was selected by Super Lawyers as a Southern California Rising Star in 2021, 2022, 2024, and 2025.

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

15 REASONABLENESS OF THE REQUESTED FEE AWARD

16 16. When this case was taken on a contingent fee basis, with the firm agreeing to assume
17 responsibility for litigation costs, the ultimate result was far from certain. In the course of this litigation,
18 the Sentinel Firm, APC paid filing fees, LexisNexus fees, copy charges and mailing, telephone and mail
19 charges. There was never a guarantee that the Sentinel Firm, APC, would recoup those expenditures. The
20 firm took on this case, which necessarily required the firm to forego other opportunities, given finite
21 resources to devote to cases.

22 17. Because of the uncertainty of the outcome in this and other wage and hour litigation
23 undertaken by The Sentinel Firm, APC, we took this case with the expectation that a risk enhancement,
24 either in the form of a lodestar multiplier or a percentage of the fund award equivalent thereto, would be
25 available if we prevailed. This expectation stems from the fact that many cases we undertake as putative
26 class actions do not resolve successfully.

27 18. Class Counsel's experience in employment class actions was integral in evaluating the
28 strengths and weaknesses of the case against Defendants and the reasonableness of the settlement.

Practice in the narrow fields of wage and hour litigation requires skill and knowledge concerning the rapidly evolving substantive law (state and federal), as well as the procedural law of class action litigation.

19. Just as the Court in *Chavez v. Netflix, Inc.*, 162 Cal. App. 4th 43, 66, n.11 (2008) observed, it has been my experience, that attorney fee awards of one-third of a common settlement fund are the rule, rather than the exception. Here, Class Counsel agrees that they will seek no more than one third of the settlement amount in fees. This is consistent with common practice, consistent with Ninth Circuit practice, consistent with California law approving the percentage of the fund method to award fees from a common fund, *Laffitte v. Robert Half Intern. Inc.*, 1 Cal. 5th 480, 503 (2016), and not inappropriate in light of the many hours expended by attorneys and paralegals performing work for Plaintiffs before and after the filing of this matter. That work includes:

- (a) Numerous interviews with Plaintiff and Aggrieved Employees and review of documents provided by Plaintiff;
- (b) Investigation of the matter and exploring the corporate structure of Defendants;
- (c) Legal research and investigation regarding the Defendants' practices at numerous points in the litigation;
- (d) Reviewing multiple drafts of the original complaint and finalization and filing of the original complaint;
- (e) Extensive "meet and confer" efforts with Defendants' counsel to obtain relevant documents and information through informal discovery;
- (f) Selecting a mediator and mediation date;
- (g) Reviewing and revising statements and stipulations;
- (h) Review of payroll and time data;
- (i) Review of Defendants' policy documents;
- (j) Working with opposing counsel for the receipt of a representative sampling and analyzing the same with the aid of expert consultants and Plaintiff to perform analyses of liability and exposure prior to attendance of the mediation, preparation of a damages model with the aid of a statistics expert;

- (k) Analysis of the audit results and preparation of a damages model with the aid of a statistics expert;
- (l) Review and revisions to the damage model and supporting data analysis;
- (m) Communicate with Plaintiff who requested updates or other information regarding this matter;
- (n) Research and review of Plaintiffs' mediation brief;
- (o) Attendance at mediation;
- (p) Reviewing multiple drafts of the PAGA Settlement Agreement;
- (q) Preparation of the motion for settlement approval; and,
- (r) Review of edits to the motion for settlement approval and revisions to all documents to conform.

20. The actual lodestar incurred by Plaintiff's counsel The Sentinel Firm, APC is approximately **\$69,322.50** to date. See **Exhibit "1"** which is The Sentinel Firm, APC's task and time chart that sets forth in detail the nature of the legal services provided. The breakdown of work by attorney is as follows:

Attorney	Time	Rate	Total
Seung Yang	28.7	\$750.00	\$21,525.00
Tiffany Hyun	62.3	\$625.00	\$38,937.50
Jessica Abreu	12.8	\$450.00	\$5,760.00
Emily Platt	6.2	\$500.00	\$3,100.00
	110	Total:	\$69,322.50

EXHIBITS

21. Attached hereto as **Exhibit "1"** is a true and correct copy of The Sentinel Firm, APC's 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.

22. Attached hereto as **Exhibit "2"** is a true and correct copy of the current expense ledger for The Sentinel Firm, APC.

1 I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true
2 and correct. Executed this 6th day of March 2026, at Los Angeles, California.

3
4
5 

6 _____
SEUNG YANG, "Declarant"

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit “1”

Date	Hours	Attorney	Description
1/17/2024	4.8 SY		Initial case intake and meeting re: Olivia Pass case, review parties, evidence and claims; research into entities and suits, PAGA issues
1/31/2024	3.5 SY		Case review; discussion with client, research re: Oliva Pass v. Del
7/3/2024	2.2 SY		Review MTCA and research
7/8/2024	4.7 SY		JPA; coordination with LFJ; discussion with client re: cases
7/15/2024	5 TH		case review and prepare discovery plan; look into entities and other case and plan of coordination
7/15/2024	2 SY		Meet with TH to discuss Pass case; review and discuss various issues; research on arbitration issues and/or other case issues
7/18/2024	6.5 TH		Revisions on oppo to MTCA; research and review records, analysis and discussion with co-counsel
7/22/2024	0.8 TH		Review records re: MTCA hearing; research and discuss with LT;
7/23/2024	1.5 SY		call with LT; prep for call
8/10/2024	4.4 TH		Research into entity issues, other cases and prepare discovery map; research into issues relating to the MTCA; discovery plan; prepare list of docs/data required; coordination with LFJ/LT;
8/20/2024	1.4 SY		Records review and file review; email to LT; further discussion on arb issues and reconsideration; mediation discussions
8/27/2024	2.1 TH		Review and edit Motion for Reconsideration in Pass case
9/11/2024	0.6 TH		email to LT re: pass case, review of records
9/11/2024	1.5 TH		Review re: Motion to Compel arb/motion for reconsideration; review rulings/discuss with LT
10/23/2024	0.7 TH		review discovery issues and coordinate with LT
10/23/2024	0.9 TH		Internal discussion re: Pass case; review with BG re client
10/23/2024	0.3 TH		Review discovery issues
10/25/2024	1.6 TH		Records review re LT request
10/31/2024	3.5 TH		Global mediation discussion and arrangement; discussion with counsel and opposing counsel
11/7/2024	0.5 TH		Review email from OC; discussion with team re case map
11/7/2024	3.6 JA		Get up to speed on Pass case, review docs and files; email from OC; email to co-counsel
11/7/2024	3 TH		Assignment of duties to EP and JA re: Pass case; discussions with each; review of current status and get associates up to speed on tasks and plan of action for Pass case; emails to OC and to LT/LFJ re: mediation an discovery
12/9/2024	0.3 JA		CMC statement
12/26/2024	0.5 JA		case review; email to LT re discovery and other issues
1/29/2025	3.6 TH		Mediation issues; arrange to stay discovery/case pending mediation; case review with JA
1/29/2025	0.5 JA		TH meeting re: Pass case

		Review mediation data request and sample size- update case notes accordingly; records review; various additional work on Pass case; discussions with co-counsel; prepare CMC statements
2/20/2025	6.2 EP	
2/26/2025	2.4 JA	Review SAC and prepare memo
		Finalize mediation plan; discussions re mediation and research into mediation, various discussions
3/11/2025	4 TH	
7/10/2025	0.3 TH	Joint stip to continue CMC
		Mediation prep and brief discussion; review of records and merits issues
9/15/2025	4 TH	
9/22/2025	3 TH	mediation data review
		Prepare for mediation; prepare case notes; discussion with JA and co-counsel
9/29/2025	3.4 TH	
9/29/2025	1.1 SY	Mediation prep with TH/LT/review records
9/30/2025	9 TH	Attend mediation
9/30/2025	4.5 JA	Participate in the mediation
10/3/2025	1.6 TH	Analysis and review of MOU; revisions; discussion with LT
1/15/2026	1 JA	Settlement Agreement
1/20/2026	1.5 SY	Review Settlement particulars; discussion with LT/TH re: settlement
3/5/2026	0.1 TH	Email with LT re: final motion
3/6/2026	6 SY	Mediation prep; participate in mediation; post-mediation activities
3/6/2026	1.9 TH	Approval Motion review; edits, feedback

Total: 110.0h

Exhibit “2”

Date	Description	Rate (\$)
2/5/2024	PAGA letter mailing costs to Defendant	19.36
2/5/2024	PAGA letter LWDA submission fee	75
2/5/2024	Complaint court filing fee	1481.72
2/6/2024	Administration fee	250
2/8/2024	Peremptory challenge court filing fee through OneLegal (hand delivery)	92.66
2/26/2024	Complaint and Summons service to Defendant process service fee through JOneLegal	51.48
3/1/2024	Proof of Service court filing fee through Journal Technologies	7.26
4/11/2024	First Amended Complaint court filing fee through Journal Technologies	7.26
4/22/2024	Application to dismiss class and individual claims court filing fee through Journal Technologies	27.81
5/29/2024	CMC statement court filing fee through Journal Technologies	7.26
6/13/2024	Notice of Association of Counsel court filing fee through Journal Technologies	7.26
7/12/2024	Application to dismiss PAGA individual claim court filing fee through Journal Technologies	27.81
7/19/2024	Opposition to Motion to Compel Arbitration court filing fee and hand delivery through Steno	185
8/28/2024	Opposition to Motion for Reconsideration court filing fee through Journal Technologies	7.26
9/5/2024	Opposition to Motion for Reconsideration courtesy copy delivery fee through Steno	99
12/9/2024	CMC statement court filing fee through Journal Technologies	11.76
2/28/2025	Joint stipulation to continue Status Conference and Mediation completion deadline court filing fee through Journal Technologies	32.31
3/28/2025	Opposition to Defendant's second motion for reconsideration court filing fee through Journal Technologies	11.76
4/8/2025	Mediation fee to Deborah Saxe/JAMS	9,333.33
6/4/2025	Joint stipulation to continue Status Conference and Mediation completion deadline court filing fee through Journal Technologies	32.31
9/17/2025	CMC statement court filing fee through Steno	59.95
10/14/2025	Economic damages expert fee to Berger consulting	3420
12/2/2025	CMC statement court filing fee via OneLegal	23.44
1/20/2026	Notice of Case Reassignment court filing fee through Steno	59.95
2/2/2026	Joint stipulation for leave to file Second Amended Complaint court filing fee through Steno	79.25
2/11/2026	Second Amended Complaint court filing fee through Steno	59.95
	PAGA settlement approval motion court filing fee through Steno	119.95
	Notice of entry of order court filing fee through Steno	59.95
	Final accounting report court filing fee through Steno	59.95
Total		15710

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 PLAINTIFFS' MOTION FOR AN ORDER APPROVING
10 SETTLEMENT OF CLAIMS BROUGHT PURSUANT TO THE PRIVATE ATTORNEY
11 GENERAL'S ACT OF 2004** on the interested parties in this action by sending a true copy thereof
12 to interested parties as follows and as stated on the attached service list:

13 Summer Young-Agriesti

14 syoung@kbylaw.com

15 Ana Thomas

16 athomas@kbylaw.com

17 Melissa Brandman

18 mbrandman@kbylaw.com

19 Andrew Cristea

20 acristea@yatlaw.com

21 Michelle Perciavalle

22 mperciavalle@kbylaw.com

23 **Young-Agriesti & Thomas, LLP**

24 7755 Center Avenue, Suite 1100

25 Huntington Beach, California 92647

26 Telephone: 949-221-8700

27 Facsimile: 949-222-1044

28 *Attorneys for Defendants DEL AMO HOSPITAL, INC.*

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

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

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

26 Executed on March 8, 2026, at Los Angeles, California.

27 Ivette Hernandez

28 _____
Name

Signature