

1 Lilit Tunyan (SBN 329351)

ltunyan@tunyanlaw.com

2 Artur Tunyan (SBN 349174)

atunyan@tunyanlaw.com

3 **TUNYAN LAW, APC**

535 N. Brand Blvd., Suite 285

4 Glendale, California 91203

Telephone: (323) 410-5050

5 Seung Yang (SBN 249857)

seung.yang@thesentinelfirm.com

6 Tiffany Hyun (SBN 311743)

tiffany.hyun@thesentinelfirm.com

7 **THE SENTINEL FIRM, APC**

8 355 S. Grand Ave., Suite 1450

9 Los Angeles, California 90071

Telephone: (213) 985-1150

10 Facsimile: (213) 985-2155

11 Attorneys for Plaintiff NICOLE DEZA,

12 as an individual and on behalf of all

employees similarly situated

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **FOR THE COUNTY OF PLACER**

15
16 NICOLE DEZA, as an individual and on
behalf of all employees similarly situated,

17 Plaintiff,

18 vs.

19 EURO SNACK, INC., a California
20 Corporation; and DOES 1 through 50,
inclusive,

21 Defendants.

Case No.: S-CV-0052505

Assigned for All Purposes to:

Hon. Trisha Hirashima, Dept. 42

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

Date: September 16, 2025

Time: 8:30 a.m.

Courtroom: Dept. 42

Judge: Hon. Trisha Hirashima

Action Filed: March 25, 2024

Trial Date: Not Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

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 Nicole Deza (“Plaintiff”) and the putative Class.

3. On May 8, 2025, in Courtroom 42 of the above-entitled Court, the Honorable Trisha Hirashima preliminarily approved the Settlement Agreement entered into between Plaintiff and defendant Euro Snack, Inc. (“Defendant”) and conditionally certified the Class for settlement purposes. The Court preliminarily appointed Plaintiff as the representative of the Class (“Class Representative”). The Court also preliminarily appointed and designated Tunyan Law, APC and The Sentinel Firm, APC as counsel for the Class (together, “Class Counsel”). The Court approved and ordered sending of the court approved Notice of Class Action Settlement and Payment Election Form, and adopted the notice, opt-out, and objection procedures, and ordered their implementation. The Court appointed Apex Class Action LLC (“Apex” or “Settlement Administrator”) to serve as Settlement Administrator for handling the notice and settlement administration process.

4. Several attorneys at the Sentinel Firm, APC have been actively engaged in litigating this matter since the inception of the above-captioned action (the “Action”), which was filed on March 25, 2024.

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

1 Settlement.

2 6. Plaintiff moves for an award of attorneys' fees to Class Counsel in the amount of \$65,000.00
3 which is thirty-three and one third percent (33.333333%) of the Gross Settlement Amount of
4 \$195,000.00. 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 **\$35,137.50** to date. The breakdown of work by attorney is as follows:

Attorney	Time	Rate	Total
Seung Yang	12.6	\$750	\$9,450.00
Tiffany Hyun	41.1	\$625	\$25,687.50
	53.7	Total:	\$35,137.50

15
16
17
18
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 20th day of August 2025, at Los Angeles, California.

25
26
27
28


SEUNG YANG

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

On the date indicated below, I served the document described as: **DECLARATION OF SEUNG YANG IN SUPPORT OF PLAINTIFF’S MOTION FOR FINAL APPROVAL OF 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:

Attorneys for Defendant EURO SNACK, INC.

☒ **BY ELECTRONIC SERVICE:** Based on a court order, Rule of Court, or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed above via electronic mail. I did not receive an error message.

Executed on August 20, 2025, at Los Angeles, California.

Signature