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Attorneys for Plaintiff NICOLE DEZA,
as an individual and on behalf of all
employees similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF PLACER**

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

Plaintiff,

vs.

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

Defendants.

Case No.: S-CV-0052505

[Assigned for all purposes to Hon. Todd Irby,
Department 6]

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

Date: April 29, 2025
Time: 8:30 a.m.
Courtroom: Dept. 6
Judge: Hon. Todd Irby

Action Filed: March 25, 2024
Trial Date: Not Set

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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 Nicole Deza (“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 20. During this time, Moon & Yang became one of the largest plaintiff's firms in California that specialized in

1 wage and hour class action lawsuits. I was either the lead partner or assisted in the litigation and
2 settlement of hundreds of cases including class action and PAGA action cases.

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

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

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

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

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

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

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

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

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

25 15. My office is qualified to handle this litigation because we are experienced in
26 litigation Labor Code violations in individual, class, and PAGA actions. Including myself, The
27 Sentinel Firm is comprised of ten attorneys, all of whom are actively and continuously practicing
28

1 employment litigation, representing almost entirely employee plaintiffs, in individual, class, and
2 PAGA actions, in various state and federal jurisdictions throughout the State of California. The
3 attorneys at my firm have a high level of knowledge and experience in areas of wage and hour class
4 actions, and labor and employment law.

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

8 17. I have no knowledge of any actual or potential conflict of interest with Apex Class
9 Action LLC which was selected by the Parties as a Settlement Administrator. To the best of my
10 knowledge, neither I, nor other members at The Sentinel Firm, APC have any relationship with the
11 proposed Cy Pres recipient The State Bar's Greg E. Knoll Justice Gap Fund (formerly known as
12 The State Bar's Justice Gap Fund).

13 18. I am not aware of any other pending matter or action asserting claims that will be
14 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 April 4, 2025, at Los Angeles, California.



20 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 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. On April 4, 2025, I served the foregoing document described as:

8 On the date indicated below, I served the document described as: **DECLARATION OF SEUNG YANG IN
9 SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA
10 REPRESENTATIVE ACTION SETTLEMENT** on the interested parties in this action by sending a true
11 copy thereof to interested parties as follows and as stated on the attached service list:

12 Spiros E. Fousekis
13 spiros.fousekis@ropers.com
14 Julie McElligott
15 julie.mcelligott@ropers.com
16 Breane Stryker
17 breane.stryker@ropers.com
18 **ROPERS MAJESKI PC**
19 535 Middlefield Road, Suite 245
20 Menlo Park, CA 94025
21 Tel: (650) 364-82008

22 *Attorneys for Defendant EURO SNACK, INC.*

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

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

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

Executed on April 4, 2025, at Los Angeles, California.

Karen Arellano

Name

Signature