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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

JESLYN BARRIOS, and KARINA ZAYAS,
individually, and on behalf of the State of
California and other aggrieved persons,

Plaintiffs,

v.

TRI-STATE COMMUNITY HEALTHCARE
CENTER, a California corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 24STCV28332

*[Assigned for All Purposes to the Hon.
Samantha Jessner, Dept. 7]*

**DECLARATION OF KENNETH H.
YOON IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Action Filed: October 29, 2024

I, KENNETH H. YOON, hereby declare as follows:

SUMMARY OF RESEARCH, DISCOVERY AND INVESTIGATION

4. The Parties participated in a private mediation with mediator Steven G. Mehta on March 25, 2025. The Parties did not reach an agreement to settle that day. With the help of the mediator, the parties were able to ultimately reach an agreement as to settlement terms. The negotiations were adversarial, conducted at arm's length, and tempered by the efforts of both sides to serve the interests of their clients.

5. I am one of Class Counsel in this matter. My qualifications are as follows: I received my J.D. from Loyola Law School in 1998. During law school, I interned for the Honorable Harvey Schneider, Superior Court Judge, as well as the Honorable Terry J. Hatter, Jr.,

1 United States District Court Judge. I have received an AV-Premier rating by Martindale-Hubbell.
2 I was named to the Daily Journal's 2014 and 2019 list of the "Top 75 Labor and Employment
3 Lawyers" in California. I was named to the 500 Leading Plaintiff Employment Lawyers by Law
4 Dragon from 2020 to 2025. I have also been recognized by California Super Lawyers Magazine
5 from 2016 to 2025, after having been previously recognized as a Rising Star by that publication
6 for nine years. I presently serve as an arbitrator and am on the American Arbitration Association
7 (AAA) Employment Arbitrator Panel. I have been a member of the California Employment
8 Lawyers' Association since 2013 and am serving as Co-Chair of its Wage and Hour Committee.

9 6. I obtained my undergraduate degree from UCLA in Economics in 1995. As part of
10 my undergraduate coursework, I obtained formal education in mathematics, computer
11 programming, statistics, and sufficient accounting coursework to sit for the CPA exam. My formal
12 education is critical in my present ability to litigate successfully wage and hour litigation,
13 especially with formulations of damages estimates, with analysis of computer systems and
14 algorithms for purposes of identifying class-wide issues. Further, my formal education with
15 computer systems and databases provides the background to intelligently understand the databases
16 that maintain so much of the relevant information in wage and hour litigation. I believe that my
17 formal education in mathematics, statistics and computer science provides the background
18 knowledge to litigate wage and hour class action with better understanding than counsel without
19 such background. I believe that without this type of inherent knowledge (knowledge not based on
20 reliance on expert consultants), I could not have as effectively represented Plaintiff and the Class
21 nor my other clients in other wage and hour litigation. Based on my hiring experience, I believe
22 that attorneys with even a modest background in mathematics comprise less than 10% of lawyers
23 in general.

24 7. My firm's primary focus is employment law. I have handled a significant number of
25 wage-and-hour matters, particularly class actions. I have a practice that encompasses cases in the
26 California Superior Courts and Courts of Appeal and the United States District Courts for all the
27 California districts and before the United States Court of Appeals for the Ninth Circuit.

28 8. I have been approved as class counsel in many settlement class actions. I have also

1 been appointed class counsel as part of contested class certification on over a dozen occasions
2 where I personally argued the motions and several more where I was involved to a lesser degree.
3 The following matters are just a sampling of the cases that have been granted final approval in
4 which I have been approved as class counsel: Briggs v. Custom Building Products, Inc., Los
5 Angeles Superior Court Case No. BC 343656; Rangel v. United Title Company, et al., Los Angeles
6 Superior Court Case No. BC 347222; Bernandez, et al. v. Roscoe's House of Chicken N Waffles,
7 Los Angeles Superior Court Case No. BC 351467; Campbell v. Applebee's International, Inc., et
8 al., San Diego Superior Court Case No. 37-2007-00064259-CU-OE-CTL; CVS Pharmacy Wage
9 and Hour Cases, Judicial Council Coordination Proceeding No. 4539; McBride v. Ensign United
10 States Drilling (California), Inc., Los Angeles Superior Court Case No. BC 400742; Javier, et al.
11 v. Davita Inc., et al., Los Angeles Superior Court Case No. BC 400811, Napoto v. DHL Express
12 (USA), Inc., et al., Northern District of California Case No 2009-CV-09-01551-JL; Lugliani v.
13 Kinder Morgan Energy Partners, L.P., et al., Central District of California Case No. SACV 10-
14 1303-JAK(VBKx). I argued three wage and hour matters that have resulted in influential 9th
15 Circuit opinions: *Abdullah v. U.S. Security Associates, Inc.*, 731 F.3d 952 (9th Cir. 2013), *Urbino*
16 *v. Orkin Services of California, Inc.*, 726 F.3d 1118 (9th Cir. 2013), and *Hamilton v. Wal-Mart*
17 *Stores, Inc.*, 39 F.4th 575, 579-80 (9th Cir. 2022). I also argued before the Court of Appeal and
18 was one of the counsel of record on the wage and hour matter *Nieto v. Fresno Beverage Co., Inc.*,
19 33 Cal. App. 5th 274 (2019). I was lead counsel for a wage and hour class action that was tried to
20 verdict in federal court: *Hamilton v. Wal-Mart Stores, Inc.*, Case No. 5:17-cv-01415 (C.D. Cal.
21 April. 12, 2019) (jury awards class \$6M in meal break suit).

22 9. Also partnered at my firm and serving as Class Counsel in this action is Stephanie
23 E. Yasuda. Ms. Yasuda assisted as needed throughout various aspects of the action. I directly
24 supervised all attorneys work product to ensure the quality of the work, the necessity of the work,
25 and to minimize duplication of attorney time. Ms. Yasuda received her J.D. from Loyola Law
26 School, Los Angeles, cum laude, in 2009, where she graduated in the top 10% of her class. She is
27 admitted to practice in the State of California. Ms. Yasuda was recognized as a Super Lawyer by
28 California Super Lawyers Magazine from 2020 to 2025, after having been recognized as a Rising

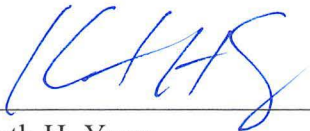
Star by that publication from 2018-2019. Ms. Yasuda has served as class counsel in numerous class actions that have been granted final approval, and Ms. Yasuda is currently handling several class and representative actions pending in state and federal court.

10. I directly supervised all attorneys' work product to ensure the quality of the work, the necessity of the work, and to minimize duplication of attorney time.

11. Yoon Law, APC was retained by Ms. Barrios to represent her on a contingency fee basis, with Yoon Law, APC advancing costs of litigation.

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

Executed on September 4, 2025 at Pasadena, California.



Kenneth H. Yoon