

Lilit Tunyan (SBN 329351)  
[ltunyan@tunyanlaw.com](mailto:ltunyan@tunyanlaw.com)  
Artur Tunyan (SBN 349174)  
[atunyan@tunyanlaw.com](mailto:atunyan@tunyanlaw.com)  
**TUNYAN LAW, APC**  
535 N. Brand Blvd., Suite 285  
Glendale, California 91203  
Telephone: (323) 410-5050

Attorneys for Plaintiff JAVIER HERNANDEZ,  
as an individual and on behalf of all employees similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF ORANGE**

JAVIER HERNANDEZ, as an individual and on  
behalf of all employees similarly situated,

Plaintiff,

v.

PRECISE AEROSPACE  
MANUFACTURING, INC., a California  
Corporation; and DOES 1 through 50,  
inclusive,

Defendant.

Case No.: 30-2024-01400056-CU-OE-CXC

[Assigned for all purposes to Hon. Randall J.  
Sherman, Department CX105]

**CLASS AND PAGA REPRESENTATIVE  
ACTION**

**DECLARATION OF MADELEINE K. LEE  
IN SUPPORT OF PLAINTIFF'S MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS AND PAGA REPRESENTATIVE  
ACTION SETTLEMENT**

Reservation N: 74544108

Date: August 8, 2025

Time: 10 a.m.

Courtroom: Dept. CX105

Judge: Hon. Randall J. Sherman

Action Filed: May 15, 2024

Trial: Not Set

I, Madeleine K. Lee, declare as follows:

1. I am an attorney licensed to practice before all courts in the State of California and am a shareholder with the law firm Call & Jensen, APC, counsel of record for Defendant Precise Aerospace Manufacturing, Inc. (“Defendant”) in the instant action. I have personal knowledge of the matters set forth herein and I could and would testify competently thereto, if called upon to do so.

2. Following a reasonable inquiry, neither Defendant nor Defendant’s counsel are aware of any class, representative, or other collective actions that assert claims against Defendant similar to those asserted in this action.

3. The parties have agreed to use ILYM Group Inc., as the third-party settlement administrator for the Settlement in this matter. I am not aware of any actual or potential conflicts of interest between my firm or Defendant with ILYM Group Inc.

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

Executed this 22<sup>nd</sup> day of April 2025, at Newport Beach, California.

Madeline Kane

MADELEINE K. LEE, "Declarant"

**PROOF OF SERVICE**

STATE OF CALIFORNIA )

) ss

COUNTY OF LOS ANGELES )

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 535 N. Brand Blvd., Suite 285, Glendale, California 91203. On April 22, 2025, I served the foregoing document described as:

On the date indicated below, I served the document described as: **DECLARATION OF MADELEINE K. LEE IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY 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:

John T. Egley

[jegley@calljensen.com](mailto:jegley@calljensen.com)

Madeleine K. Lee

[mlee@calljensen.com](mailto:mlee@calljensen.com)

Connie Valles

[cvalles@calljensen.com](mailto:cvalles@calljensen.com)

Catherine Miller

[cmiller@calljensen.com](mailto:cmiller@calljensen.com)

Julie Sandoval

[jsandoval@calljensen.com](mailto:jsandoval@calljensen.com)

Ellen Cohen

[ecohen@calljensen.com](mailto:ecohen@calljensen.com)

**CALL & JENSEN**

**A Professional Corporation**

610 Newport Center Drive, Suite 700

Newport Beach, CA 92660

Tel: (949) 717-3000

***Attorneys for Defendant PRECISE AEROSPACE MANUFACTURING, INC.***

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

[✓] **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.

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

Executed on April 22, 2025, at Los Angeles, California.

Lilit Tunyan



Name

Signature