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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

EMILIO VALENCIA, BENJAMIN HARRISON, JARED TURNER, JUSTIN TURNER, JUDEAUGUST SAN NICOLAS, and LILIANA MAGANA, individually, on behalf of all others similarly situated, and on behalf of the State of California and other aggrieved persons, and JOSE GASTELUM, individually and on behalf of all others similarly situated, Plaintiff, v. HUGHES CIRCUITS, INC., a California corporation, and DOES 1-20, inclusive, Defendants.	Case No. 37-2024-00019289-CU-OE-CTL Assigned for All Purposes to: *The Hon. Euketa Oliver* Dept.: C-75 **DECLARATION OF YOONIS HAN IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT** Hearing: January 14, 2027 Time: 10:00 a.m. Action Filed: April 24, 2024 Trial Date: None set

DECLARATION OF YOONIS HAN

I, YOONIS HAN, declare as follows:

1. I am an attorney at law licensed to practice before this Court. I am a partner at Verum Law Group, APC, and counsel for Liliana Magana ("Plaintiff Magana") in this matter. I have personal knowledge of all of the facts set forth herein. If called as a witness, I could and would competently testify thereto.

2. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

QUALIFICATIONS AS COUNSEL

3. I am a 2007 graduate of Loyola Law School, Los Angeles.

4. Since graduating from law school in 2007, my practice has consisted primarily of employment law litigation. In June 2008, I began working as an associate attorney at a law office, in Los Angeles, working mostly on employment and business litigation matters, including individual and class action matters. I was often the only associate staffed on such cases. In particular, I received a wide-array of wage and hour experience performing the following types of tasks: drafting complaints, drafting and arguing oppositions to demurrers and motions to strike, drafting and responding to written discovery; drafting, opposing and arguing discovery related motions; interviewing putative class members; drafting mediation briefs; and conducting exposure analyses to assess the strengths and weaknesses of asserted claims, the likelihood of prevailing at class certification and potential damages resulting from such claims. As an associate attorney, I second-chaired a business litigation, bench trial in Los Angeles Superior Court, and obtained a favorable verdict for my client.

5. In approximately January 2010, I voluntarily resigned from the law office in Los Angeles, and in March 2010, I accepted an associate attorney position with the boutique law firm of Levinson Arshonsky & Kurtz, LLP ("LA&K"), in Sherman Oaks. During my employment at LA&K, I worked exclusively on the defense of employment law matters, including individual claims under the California's Fair Employment and Housing Act ("FEHA"), single and multi-

plaintiff wage and hour matters, and class action wage and hour cases. I played a significant role in the class action cases that I was worked on, as I was often the only associate staffed on such cases. In addition to the same job duties described in the immediately preceding paragraph herein, I also performed the following tasks: advising employers on compliance with California and federal employment laws; interviewing putative class members; drafting and obtaining declarations and individual settlement agreements/releases from putative class members; reviewing and editing class action settlement agreements; reviewing and editing motions for preliminary and final approval prepared by plaintiffs' attorneys; and serving as the primary contact to in-house counsel. In short, I played an integral role in all aspects of litigation from the inception of a matter through settlement/class certification. As an associate at LA&K, I second-chaired two employment law arbitrations and obtained a favorable defense verdict for my clients on both matters. Additionally, I spent a significant amount of time working on trial preparation on numerous employment matters.

6. In approximately March 2015, I voluntarily resigned from LA&K to accept an in-house/general counsel position with a restaurant management company, which managed approximately 1,200 restaurant employees at 6 different restaurant locations, throughout California. As General Counsel, I was entrusted with managing both the Legal and Human Resources departments, on behalf of the 6 different restaurants, and reported directly to the President/CEO and CFO of the company.

7. As General Counsel, I was responsible for litigating various individual and class action wage and hour matters in-house, which involved all of the above-mentioned litigation tasks; and overseeing and communicating with any outside counsel to manage the additional class action matters that were handled by the outside insurance defense firms. With respect to the class action wage and hour matters, in addition to the above-described tasks, I also played a significant role in conducting extensive damages analysis in-house, and leading settlement negotiations and representing the company at mediations.

8. In February 2016, I voluntarily resigned from the in-house counsel position and transitioned into litigating employment law matters exclusively from the plaintiff's side. Since

February 2016, I have been a partner and 50% shareholder of Verum Law Group, APC. Currently, approximately seventy percent (70%) of our practice is dedicated to the prosecution of wage and hour class actions, filed in both State and Federal courts throughout California. I believe that my employment defense and in-house background is extremely useful in my current employment wage and hour class action practice and allows me to serve as a better plaintiff's-side attorney, as I am able to assess, understand and see the case from the defense standpoint as well.

9. Currently, over sixty percent (60%) of our practice is dedicated to the prosecution of wage and hour class actions, filed in both State and Federal courts throughout California. I have been appointed class counsel in the following cases:

a. *Huizar v. National Metal Stampings, Inc.*, Case No. 22STCV14679, California Superior Court, Los Angeles, before the Honorable Maren Nelson.

b. *Tagle v. Brek Manufacturing Co*., Case No. 20STCV45011, California Superior Court, Los Angeles County, before the Honorable Elihu M. Berle.

c. *Merrick et al*., v. Nippon Express NEC Logistics America, Inc. et al., Case No. BC651044, California Superior Court, Los Angeles County, before the Honorable Lawrence P. Riff.

d. *Guerrero v. United States Gypsum Company*, Case No. 3:21:cv-01502-RBM-JLB, United States District Court, Southern District of California, before the Honorable Ruth Bermudez Montenegro.

e. *McNair et al., v. Impac Mortgage Corp. dba Cashcall Mortgage,* Case No. 30-2018-01019235-CU-OE-CXC, California Superior Court, County of Orange, before the Honorable William D. Claster.

f. *Covarrubias et al. v. Boudreau Pipeline Corporation*, Case No. RIC1614016, California Superior Court, County of Riverside, before the Honorable Craig G. Riemer.

g. *Goodwin et al. v. CSI, at PH, LLC et al,* Case No. 30-2016-00844674-CU-OE-CXC, California Superior Court, County of Orange, before the Honorable Randall

J. Sherman.

h. *Jackson et al, v. SPS Technologies, LLC, et al*., Case No. 2:15-cv-09854-AB (JCx), the United States District Court – Central District of California, before the Honorable Andre Birotte, Jr.

i. *Rodriguez v. Guadalupe R. Medina et al*., Case No. CIVDS1602243, California Superior Court, County of San Bernardino, before the Honorable David Cohn.

j. *Luna v. Vernon Security, Inc.*, Case No. BC612855, California Superior Court, County of Los Angeles, before the Honorable John Shepard Wiley, Jr.

k. *Kim v. Manna Y&K One, Inc.*, Case No. 37-2017-00024051-CU-OE-CTL, California Superior Court, County of San Diego, before the Honorable Gregory Pollack.

l. *Torres, et al. v. Utility Tree Service, Inc.*, Lead Case No. 2015-1-CV-286314 (JCCP-5035), California Superior Court, County of Santa Clara, before the Honorable Patricia M. Lucas.

m. *Jimenez v. Pacific Die Casting*, Case No. BC687401, California Superior Court, County of Los Angeles, before the Honorable Amy D. Hogue.

n. *Saldivar v. W.A. Thompson Distributing Co. of Mojave*, Case No. 19STCV41168, California Superior Court, County of Los Angeles, before the Honorable Elihu M. Berle.

o. *Duran v. Oz Moving & Storage California, Inc., et al.*, Case No. 18STCV01144, California Superior Court, County of Los Angeles, before the Honorable Ann I. Jones.

p. *Aguas v. Mamco, Inc.*, Case No. RIC1902499, California Superior Court, County of Riverside, before the Honorable Sunshine S. Sykes.

q. *Quintero v. Hillsides*, Case No. BC694019, California Superior Court, County of Los Angeles, before the Honorable David S. Cunningham.

r. *Covarrubias et al. v. Boudreau Pipeline Corporation*, Case No. RIC1614016, California Superior Court, County of Riverside, before the Honorable Craig G.

Riemer.

s. *Luna v. Vernon Security, Inc.,* Case No. BC612855, California Superior Court, County of Los Angeles, before the Honorable John Shepard Wiley Jr.

t. *Goodwin et al. v. CSI, at PH, LLC et al,* Case No. 30-2016-00844674-CU-OE-CXC, California Superior Court, County of Orange, before the Honorable Randall J. Sherman.

u. *Jackson et al, v. SPS Technologies, LLC, et al*., Case No. 2:15-cv-09854-AB (JCx), the United States District Court – Central District of California, before the Honorable Andre Birotte, Jr.

v. *Saavedra v. DisplayIt, LLC*, Case No. 30-2024-01403288-CU-OE-CXC, California Superior Court, County of Orange, before the Honorable William D. Claster.

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

Executed on October 22, 2026 at Los Angeles, California.

/s/ Yoonis Han
Yoonis Han