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Attorneys for Plaintiff LILIANA MAGANA

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 SAM KIM IN SUPPORT OF PLAINTIFFS' 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 SAM KIM

I, SAM KIM, declare as follows:

1. I am an attorney at law licensed to practice before all of the courts of the State of California. I am a partner at Verum Law Group, APC ("VLG"), counsel for Plaintiff Liliana Magana ("Plaintiff Magana") in this matter. I have personal knowledge of the facts set forth herein, and 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.

QUALIFICATIONS AS COUNSEL

3. I am a 2007 graduate of Chapman University of Law. During law school, I worked as a judicial extern at the United States Bankruptcy Court located in Santa Ana, California, for the Honorable Erithe A. Smith.

4. Since graduating from law school, my practice has been focused on employment litigation. In 2008, I worked for a boutique employment litigation firm in Irvine, which primarily handled class action litigation. While at this firm, I handled various aspects of litigation, including drafting and amending complaints, preparing mediation briefs, and preparing damage analysis for class wide claims.

5. In April 2012, I voluntarily resigned in order to accept an associate attorney position in another employment litigation firm in Long Beach. During my employment at the firm, I almost exclusively worked on wage and hour class and collective actions. For the vast majority of these cases, I was the only associate staffed on the matter, and I performed a significant role on such cases. In particular, I received a wide variety of wage and hour class action experience performing the following tasks: oppositions to demurrers, oppositions to motions to strike and/or dismiss, motions for remand, drafting and responding to written discovery, drafting and responding to discovery motions, arguing discovery motions, interviewing putative class member and obtaining declarations in support of class certification, drafting motions for class certification, arguing motions for class certification, preparing damage analysis to assess strengths and weaknesses of claims, drafting mediation briefs, attending

mediations, defending class representatives during their deposition, defending class members during their depositions, and deposing the Person Most Qualified for employers. In short, I played a key role in all aspects of litigation from the inception of a matter through class certification. I also supervised the work of several associates, who were staffed on the same (or other) wage and hour actions. Although not exhaustive, below is a list of a few cases that I performed a substantial amount of work on while I was at the firm.

- *Levanoff v. Socal Wings LLC*, Case No. 30-2011-00511808-CU-OE-CXC, California Superior Court, County of Orange County, the Honorable Thierry Patrick Colaw presiding (obtained class certification on behalf non-exempt restaurant employees).
    - Primary handling attorney, including drafting and arguing motion for leave to amend, deposing Persons Most Qualified, drafting and arguing motion for class certification (granted 7 out of 8 causes of action), defending class member depositions, and drafting motion for remand.
- *McClean v. Summit Career College, Inc*. Case No. CIVDS1011407, California Superior Court, County of San Bernardino, the Honorable John M. Pacheco presiding (obtained class certification on behalf of misclassified admissions representatives).
    - Primary handling attorney, including drafting and arguing motion for class certification, drafting mediation briefs, attending mediations, reaching global settlement where highest paid class member received over $70,000.00 as part of the settlement.
- *Quintana et al. v. Big O Tires, LLC* et al., Case No. BC451272, California Superior Court, County of Los Angeles, the Honorable Kenneth R. Freeman presiding.
    - Primary handling attorney for the firm (case was consolidated with *Goegan, et al. v. TBC Retail Group, et al*., County of Orange County, County of Orange County), including reviewing and editing motion for class certification, defending class member depositions, interviewing putative class member and preparing class member declaration in support of class certification, defending class member depositions.

- *Patterson v. Cooper Services, Inc, et al*., Case No. BC525387, California Superior Court, County of Los Angeles, the Honorable Kenneth Freeman presiding.
- *De La Torre v. CRI-Help, Inc.*, Case No. BC508430, California Superior Court, County of Los Angeles, the Honorable William F. Highberger presiding.
- *Flores v. Beach Cities Eldercare, Inc. dba Home Instead Senior Care*, Case No. BC544611, California Superior Court, County of Los Angeles, the Honorable Jane Johnson presiding.
- *Cuellar v. S.K. Laboratories, Inc.*, Case No. 30-2014-00717705-CU-OE-CXC, California Superior Court, County of Orange County, the Honorable Robert Moss presiding.
- *Fernandez v. Teva Parenteral Medicine, Inc*., Case No. 30-2010-00412849-CU-PE-CXC, California Superior Court, County of Orange County, the Honorable Nancy Wieben Stock presiding.

6. In June 2015, I voluntarily resigned from the firm in order to accept an associate attorney position with another employment litigation firm in Irvine. During my employment at the firm, I worked on single and multi-plaintiff wage and hour matters. In addition to my wage and hour practice, I was also staffed on a number of single and multi-plaintiff actions primarily asserting claims under California's Fair Employment and Housing Act ("FEHA"), which were venued in both State and federal court.

7. In February 2016, I voluntarily resigned to become a founding partner/shareholder of Verum Law Group, APC. 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. Verum Law Group, APC prosecutes wage and hour cases, including class actions on behalf of employees and others who have had their rights violated. Verum Law Group, APC, either on its own, or with co-counsel are currently serving as plaintiffs' counsel of record in dozens of wage and hour and employment class action cases pending in both state and federal court.

8. The attorneys working on this case, myself and Yoonis Han, have been appointed class counsel in many cases, through both contested motions and settlement approval motions.

The following list, while not exhaustive, includes some of the cases where Verum Law Group, APC has been appointed as class counsel.

a. *Morin et al. v. Dealer's Choice Truckaway System, Inc. dba Truckmovers,* United States District Court, Central District, before the Honorable Wesley L. Hsu, Case No. 2:23-cv-00216-WLH-SK.

b. *Alvarez v. Marine Fenders International, Inc.,* Case No. 21STCV22601, California Superior Court, Los Angeles, before the Honorable Elihu M. Berle.

c. *Towell et al. v. O'Gara Coach Company, LLC,* Case No. 19STCV45961, California Superior Court, Los Angeles, before the Honorable William F. Highberger.

d. *Hernandez et al. v. Christensen Brothers General Engineering, Inc. et al*., Case No. 5:22-cv-00836 AB (SP), United States District Court – Central District of California before the Hon. André Birotte Jr.

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

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

g. *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.

h. *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.

i. *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.

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

Riemer.

k. *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.

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

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

n. *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.

o. *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.

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

q. *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.

r. *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.

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

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

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.

9. On October 20, 2026, Plaintiff Magana filed a stipulation to dismiss the Magana Action without prejudice, Case No. 25CU036271C.

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

Executed at El Segundo, California on October 22, 2026.

/s/ Sam Kim
Sam Kim