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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN

ANNAALICIA LEBLANC, as an
individual and on behalf of all others
similarly situated,

Plaintiff,

vs.

O’CONNOR WOODS HOUSING
CORPORATION, a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: STK-CV-UOE-2024-0009405

[Assigned to the Hon. Robert T. Waters, Dept. 11B]

**DECLARATION OF KWANPORN “MAI”
TULYATHAN IN SUPPORT OF PLAINTIFF’S
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

Date: 11/26/25, 12/2/25, 12/3/25, 12/4/25, 12/9/25

Time: 9:00 a.m.

Dept.: 11B

Action Filed: August 7, 2024

Trial Date: None

1 **DECLARATION OF KWANPORN “MAI” TULYATHAN**

2 I, Kwanporn Tulyathan, declare as follows:

3 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
4 California, and am with the law firm Diversity Law Group, counsel of record for Plaintiff
5 Annaalicia LeBlanc (“Plaintiff”). I have personal knowledge of the facts set forth below and if
6 called to testify I could and would do so competently.

7 2. Based on my independent investigations and evaluation, I believe that settlement
8 for the consideration and on the terms set forth in the Joint Stipulation of Class Action
9 Settlement (“Settlement Agreement”) is fair, reasonable, and adequate and is in the best interests
10 of the Class in light of all known facts and circumstances and the expenses and risks inherent in
11 litigation.

12 3. After taking into account sharply disputed factual and legal issues involved in this
13 litigation, the risks attending further prosecution, and the substantial benefits to be received
14 pursuant to the compromise and settlement of the litigation, Plaintiff and Class Counsel have
15 concluded that settlement on the terms set forth in the Settlement Agreement is appropriate and
16 in the best interests of the Parties and that this settlement is fair and reasonable.

17 4. I am one of the primary attorneys on this matter. My qualifications are as follows:
18 I received my JD from Loyola Law School in 2017. I received the First Honors Award in Legal
19 Research and Writing, First Honors Award in Appellate Advocacy, and First Honors Award in
20 Civil Litigation Practicum I for achieving the highest grade in those classes. During law school, I
21 was a Staff Editor for Loyola Law Review. I was also an extern at the U.S. District Court,
22 Central District of California, for the Honorable Christina A. Snyder, and a certified law clerk at
23 the San Diego County District Attorney’s Office, Collaborative Courts Division, and the Los
24 Angeles County District Attorney’s Office, Consumer Protection and Environmental Crimes
25 Division. In 2016, I participated in Loyola Law School’s Scott Moot Court Competition, where I
26 placed Top 16 and was awarded the Top Ten Brief Award. In 2017, I participated in the
27 Employment Rights Clinic, an extension of the Division of Labor Standards Enforcement created
28 to investigate retaliation complaints. Upon graduation from law school, I was admitted to the

1 California Bar in December 2017.

2 5. I am currently an associate at the law firm of Diversity Law Group, P.C., an
3 employment law firm that has handled numerous wage and hour class and individual actions, on
4 both plaintiff and defense sides. The firm currently has cases in numerous state courts, including
5 the Santa Clara Superior Court, Los Angeles Superior Court, Orange County Superior Court, San
6 Diego County Superior Court, Monterey County Superior Court, as well as the United States
7 District Courts for the Central, Northern, Southern, and Eastern Districts of California.

8 6. I am currently handling and/or have handled numerous wage and hour class action
9 and PAGA lawsuits, including *Magadia v. Wal-Mart Associates, Inc., et al.* (N.D. Cal., Case
10 Number 5:17-cv-00062-LHK); *Garcia v. Wal-Mart Associates, Inc., et al.* (S.D. Cal., Case
11 Number 3:18-cv-00500-L-MDD); *Lao v. H & M Hennes & Mauritz, L.P.* (N.D. Cal., Case
12 Number 5:16-cv-333 EJD); *Arroyo v. Int'l Paper Company* (N.D. Cal., Case Number 5:17-cv-
13 06211-BLF); *Baker v. California Forensic Medical Group, Inc., et al.*, Judicial Council
14 Coordination Proceeding No. 4999 (Monterey County Superior Court, Lead Case No.
15 17CV003723).

16 7. In 2018, I argued before the California Court of Appeal, Second Appellate
17 District, in the case of *Lee v. California Commerce Club, Inc.* (California Court of Appeal Case
18 Number B276171, LASC Case Number BC596924), and *Perez v. Standard Drywall, Inc.*
19 (California Court of Appeal Case Number A146819, Alameda Sup. Ct. No. RG15761142). In
20 that same year, I also assisted the firm in successfully obtaining class certification and partial
21 summary judgment by the United States District Court, Northern District of California in the
22 case of *Magadia v. Wal-Mart Associates, Inc.* (N.D. Cal., Case Number 17-CV-00062-LHK). I
23 third chaired the bench trial in that same case in December 2018.

24 8. I have also been certified and/or approved as class counsel in numerous other
25 wage/hour class actions. Most recently, I was certified as class counsel in the cases *Garcia v.*
26 *Wal-Mart Associates, Inc., et al.* (S.D. Cal., Case Number 3:18-cv-00500-L-MDD), *Richert v.*
27 *Samaritan, LLC, et al.* (Santa Clara County Superior Court, Case Number 17CV314186), *Song v.*
28 *THC – Orange County, Inc.* (C.D. Cal., Case No. 8-17-cv-965-JLS (DFM)), *Hernandez v. Wells*

1 *Fargo Bank National Ass’n, et al.* (Santa Clara County Superior Court, Case No. 16-CV-
2 299319), and *Sims v. QG Printing II, LLC, et al.* (C.D. Cal., Case No. ED CV 20-1632-DMG
3 (KKx)), as part of the courts’ orders granting class certification pursuant to Fed. R. Civ. P. 23
4 and California Code of Civil Procedure § 382.

5 9. Moreover, I was granted final approval as class counsel in *Lao v. H & M Hennes*
6 *& Mauritz, L.P.* (N.D. Cal., Case No. 5:16:cv-333 EJD), *Abarca v. El Estero Car Wash, Inc. et*
7 *al.* (Monterey County Superior Court, Case No. 18CV003398), *Valles v. Community Hospital of*
8 *the Monterey Peninsula* (Monterey County Superior Court, Case No. 17CV003452), *Hernandez*
9 *v. Wells Fargo Bank National Ass’n, et al.* (C.D. Cal., Case No. 16-CV-299319), *Baker v.*
10 *California Forensic Medical Group, Inc., et al.*, Judicial Council Coordination Proceeding No.
11 4999 (Lead Case No. 17CV003723), and *Mendez v. Falcon Trading Company* (Monterey
12 County Superior Court, Case No. 19CV004512).

13 10. My co-counsel and I will adequately represent the Class in this action. Plaintiff’s
14 counsel have and will zealously represent Plaintiff and the Class and pursue this lawsuit to its
15 conclusion.

16 11. I have no conflicts with the Class and will adequately represent the Class.

17 12. I have no conflicts with Legal Aid at Work, which is the proposed *cy pres*
18 recipient of the unclaimed funds resulting from this proposed settlement.

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

21 Executed on this 30th day of October 2025, at Los Angeles, California.

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23 Kwanporn Tulyathan
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