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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO**

KYLE KELLUM, on behalf of himself and all
others similarly situated,

Plaintiff,

vs.

ACE PLUMBING & ROOTER INC., a
California Corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. CGC-24-617510

**CLASS ACTION AND PAGA
REPRESENTATIVE ACTION**

*[Assigned for all purposes to the
Hon. Ethan P. Schulman, Dept. 304]*

**DECLARATION OF TUVIA
KOROBKIN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA ACTION
SETTLEMENT**

Date: August 18, 2026
Time: 11:00 a.m.
Dept.: 304

[Hearing Date and Time Was
Approved By Dept. 304]

Action Filed: August 26, 2024
Trial Date: None Set

1 I, TUVIA KOROBKIN, declare as follows:

2 1. I am an attorney at Marquee Law Group, A Professional Corporation, attorneys of
3 record for Plaintiff Kyle Kellum (“Plaintiff”) and the proposed Settlement Class in the above-
4 captioned matter. I am a member in good standing of the bar of the State of California and am
5 admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration
6 and could testify competently to them if called upon to do so.

7 2. I am a 2009 graduate of the UCLA School of Law. I was admitted to the California
8 State Bar in December 2009 after passing the bar exam on my first attempt. Since that time, I
9 have practiced almost exclusively in the area of employment litigation. From May 2010 to May
10 2014, I worked as an associate at the employment law firm of Eisenberg & Associates in Los
11 Angeles. From May 2014 to January 2016, I worked as an associate at the employment law firm
12 of Setareh Law Group in Beverly Hills. The vast majority of my work at both Eisenberg &
13 Associates and Setareh Law Group focused on representing employees in wage and hour and
14 wrongful termination actions, including wage and hour class actions. Although non-exhaustive,
15 the types of work I performed at those firms included: conducting client intakes; performing pre-
16 filing research and analysis; drafting complaints; attending court hearings; corresponding with
17 opposing counsel; drafting and responding to written discovery; taking and defending
18 depositions; analyzing payroll and timekeeping records and employee handbooks; drafting and
19 opposing a variety of motions including motions for summary judgment, motions for remand,
20 demurrers and motions to dismiss, motions to compel, motions to quash, and motions for class
21 certification; drafting mediation briefs and attending mediations; drafting long-form settlement
22 agreements; drafting motions for preliminary and final settlement approval; and overseeing the
23 claims and/or opt-out processes. I also drafted appellate briefs for the California Court of Appeal
24 and the Ninth Circuit Court of Appeals, and argued before the California Court of Appeal, all in
25 connection with employment matters.

26 3. In February 2016 I joined Haines Law Group, APC (HLG) in El Segundo,
27 California, as an associate attorney. In December 2019 I was promoted to Partner, a position I
28 held until I resigned from HLG in July 2022. While at HLG, I performed many of the same duties

1 identified in the preceding paragraph, and I also managed junior and mid-level associates. During
2 my tenure with HLG I handled over 100 wage and hour class actions and Private Attorneys
3 General Act (“PAGA”) actions, resulting in more than \$100 million in total settlements on behalf
4 of California workers.

5 4. In July 2022 I joined Abramson Labor Group (ALG) as Senior Counsel in the
6 firm’s Class Action Department, where I grew the Class Action Department to approximately 80
7 active wage and hour class and PAGA actions throughout California. In addition to managing the
8 caseload and day-to-day operations of the Class Action Department, I supervised associate
9 attorneys and performed many of the same duties described in the two prior paragraphs.

10 5. In March 2024 I joined Marquee Law Group as Senior Counsel and Chair of the
11 Class Action Department. I currently manage and play an active role in approximately 55 active
12 wage and hour class actions and PAGA actions throughout California, and perform many of the
13 same job duties as I performed in my prior roles, in addition to supervising other attorneys’ work
14 on those cases.

15 6. The following is a non-exhaustive list of wage and hour class action settlements
16 in which I was appointed as class counsel and that have received final approval: *Bellinghausen v.*
17 *Tractor Supply Company*, Case No. 3:13-cv-02377-JSC, U.S. District Court, Northern District of
18 California, Judge Jacqueline Scott Corley presiding (granted final approval of settlement on
19 behalf of retail employees involving claims for failure to provide meal and rest periods, failure to
20 pay overtime, and other claims); *Montgomery v. Del Monte Corp.*, et al, Case No. 13C0204, Kings
21 County Superior Court, Judge James LaPorte presiding (granted final approval of settlement on
22 behalf of manufacturing employees involving claims for failure to provide meal and rest periods,
23 failure to pay overtime, and other claims); *Tesla Motors Wage and Hour Litigation*, JCCP 4792,
24 Santa Clara County Superior Court, Judge Peter H. Kirwan presiding (granted final approval of
25 settlement on behalf of automotive factory workers involving claims for failure to pay overtime,
26 failure to provide meal and rest periods, and other claims); *Nable v. TransFirst, LLC*, Case No.
27 8:15-cv-00891-DOC-JCG, U.S. District Court, Central District of California, District Judge
28 David O. Carter presiding (granted final approval of settlement of hybrid nationwide

FLSA/California Rule 23 class action involving claims for failure to pay overtime, failure to provide meal periods, off-the-clock work, and other claims); *Kostyuk, et al v. Golden State Overnight Delivery Service, Inc.*, Case No. RG14727191, Alameda County Superior Court, Honorable Winifred Y. Smith presiding (granted final approval of settlement on behalf of courier drivers involving claims for failure to provide meal periods, failure to pay wages, and other claims); *Leverage, et al v. Traeger Pellet Grills, LLC, et al*, Case No. 4: 16-cv-00784-KAW, U.S. District Court for the Northern District of California, Judge Kandis A. Westmore presiding (granted final approval of settlement on behalf of grill demonstrators involving claims for independent contractor misclassification, unpaid minimum wages, unpaid overtime, failure to provide meal periods, failure to authorize and permit rest periods, unlawful deductions from wages, and other claims); *Rendon v. AEP Industries, Inc.*, Case No. CIVDS1621981, San Bernardino County Superior Court, Judge David S. Cohn presiding (granted final approval of settlement on behalf of non-exempt employees involving claims for unpaid wages and overtime wages, meal and rest periods, and other claims); *Orozco v. CashCall, Inc.*, Case No. 30-2017-00902026-CU-OE-CXC, Orange County Superior Court, Judge Glenda Sanders presiding (granted final approval of settlement on behalf of non-exempt employees involving claims for unpaid wages and overtime wages, meal and rest periods, and other claims); *Barrios v. Providence Hospitality Partners, LLC*, Case No. 56-2016-00484750-CU-OT-VTA, Ventura County Superior Court, Judge Vincent J. O'Neill presiding (granted final approval of settlement on behalf of non-exempt employees involving claims for unpaid wages and overtime wages, meal and rest periods, and other claims); *Rojas v. Shultz Steel Company*, Case No. BC635967, Los Angeles County Superior Court, Judge Kenneth R. Freeman presiding (granted final approval of settlement on behalf of non-exempt employees involving claims for unpaid wages and overtime wages, meal and rest periods, and other claims); *Gooding v. Vita-Mix Corp., et al*, Case No. 2:16-cv-03898-ODW, U.S. District Court for the Central District of California, Judge Otis D. Wright presiding (granted final approval of settlement on behalf of blender demonstrators involving claims for independent contractor misclassification, unpaid wages, failure to provide meal and rest periods, and other claims); *Salas v. Alsco, Inc. dba Steiner Corporation, et al*, Case No. 34-2019-

1 00266950-CU-OE-GDS, Sacramento County Superior Court, Judge Christopher E. Kreuger
2 presiding (granted final approval of settlement on behalf of linen distribution employees involving
3 claims for failure to pay wages, meal and rest period violations, and other claims).

4 7. I have also moved to certify and have received an order certifying a class action
5 in multiple cases, including *Ontiveros v. Safelite Fulfillment, Inc.*, Case No. CV 15-7118-DMG
6 (RAOx), U.S. District Court, Central District of California, Honorable Dolly M. Gee presiding
7 (certifying six classes of employees for claims including rest period violations, wage statement
8 violations, meal period violations, and overtime and double-time violations); *Caudle, et al. v.*
9 *Sprint/United Management Company, et al.* Case No. C 17-06874-WHA, U.S. District Court,
10 Northern District of California, Honorable William H. Alsup presiding (certifying three classes
11 of employees for unlawful wage deduction violations, wage statement violations, and waiting
12 time violations); and *Perez, et al v. Sunbelt Rentals*, Case No. 37-2018-00026405-CU-OE-CTL,
13 San Diego County Superior Court, Hon. Eddie C. Sturgeon (certifying wage statement class).

14 8. In 2018, 2019, 2020, 2021, 2022, 2023, 2024, and 2025, Thomson Reuters
15 recognized me as a “Rising Star” in Southern California in the area of employment law in the
16 annual Super Lawyers magazine. This is an honor awarded to no more than two-and-a-half
17 percent (2.5%) of attorneys under the age of forty in Southern California each year.

18 9. As counsel for Plaintiff and the Settlement Class, I have been intimately involved
19 in every aspect of this case since I joined Marquee Law Group in March 2024 through the present.
20 Based on my extensive experience litigating similar wage and hour class actions, I believe the
21 proposed Settlement is fair, reasonable and adequate for the Settlement Class.

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct. Executed on July 23, 2026 at Beverly Hills, California.

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25 Tuvia Korobkin
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