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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA**

SARAH ROBERTS-COOPER, as an
individual and on behalf of all others
similarly situated,

Plaintiff,

vs.

RISE LUXURY REHAB, LLC, a
Delaware limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 2024CUOE033989

[Assigned to the Hon. Charmaine H. Buehner,
Dept. 44]

**DECLARATION OF MAI TULYATHAN IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS AND
REPRESENTATIVE ACTION SETTLEMENT**

Date: July 29, 2026
Time: 1:30 p.m.
Dept.: 44

Action Filed: December 4, 2024
Trial Date: None Set

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I, Mai Tulyathan, declare as follows:

1. I am an attorney at law, duly licensed to practice before all courts in the State of California, and am with the law firm Diversity Law Group, P.C., counsel of record for Plaintiff Sarah Roberts-Cooper (“Class Representative” or “Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. The proposed settlement meets the criteria for this Court to grant final approval of this matter on a class-wide basis, as the settlement is fair, adequate, and reasonable.

3. The Joint Stipulation of Class and Representative Action Settlement and the Amendment to Joint Stipulation of Class and Representative Action Settlement (together, the “Agreement” or “Settlement Agreement”) was the product of negotiation between highly able and experienced attorneys on both sides who possessed the relevant data and legal research which they had carefully analyzed. Class Counsel engaged in extensive factual investigation before settling, including exchanging informal discovery and sample of time and payroll records, reviewing class and PAGA data, and reviewing Defendant’s pertinent policies and practices relevant to valuing this case. Class Counsel also retained an expert to analyze the time and payroll records and conduct any extrapolation. This allowed Class Counsel to conduct a full damage analysis. The Parties also engaged in arm’s-length negotiations at mediation with the Hon. Lisa Cole (Ret.), which resulted in this settlement.

4. The settlement in the case at bar warrants approval and carries a presumption of fairness. As previously noted in the application for Preliminary Approval, this current settlement was negotiated at arm's length. I support the settlement as fair, reasonable, and adequate, and in the best interest of the Settlement Class Members as a whole.

5. Any remaining monies from uncashed settlement checks will be distributed to the *cy pres* recipient Legal Aid At Work. I do not have any relationship with Legal Aid At Work that would create an actual or potential conflict of interest. The Parties further agree that proposed *cy pres* recipient satisfies the legislative intent set out in Code of Civil Procedure § 384(a), in that the organization helps further the purposes of the underlying action and promote justice for all

1 Californians.

2 **ATTORNEY EXPERIENCE**

3 6. I am one of the attorneys on this matter. My qualifications are as follows: I received
4 my JD from Loyola Law School in 2017. I received the First Honors Award in Legal Research and
5 Writing, First Honors Award in Appellate Advocacy, and First Honors Award in Civil Litigation
6 Practicum I for achieving the highest grade in those classes. During law school, I was a Staff Editor
7 for Loyola Law Review. I was also an extern at the U.S. District Court, Central District of
8 California, for the Honorable Christina A. Snyder, and a certified law clerk at the San Diego
9 County District Attorney's Office, Collaborative Courts Division, and the Los Angeles County
10 District Attorney's Office, Consumer Protection and Environmental Crimes Division. In 2016, I
11 participated in Loyola Law School's Scott Moot Court Competition, where I placed Top 16 and was
12 the awarded the Top Ten Brief Award. In 2017, I participated in the Employment Rights Clinic, an
13 extension of the Division of Labor Standards Enforcement created to investigate retaliation
14 complaints. Upon graduation from law school, I was admitted to the California Bar in December
15 2017.

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

22 8. I am currently handling and/or have handled numerous wage and hour class action
23 and PAGA lawsuits.

24 9. In 2018, I argued before the California Court of Appeal, Second Appellate District,
25 in the case of *Lee v. California Commerce Club, Inc.* (California Court of Appeal Case Number
26 B276171, LASC Case Number BC596924), and *Perez v. Standard Drywall, Inc.* (California Court
27 of Appeal Case Number A146819, Alameda Sup. Ct. No. RG15761142). In that same year, I also
28 assisted the firm in successfully obtaining class certification and partial summary judgment by the

1 United States District Court, Central District of California in the case of *Magadia v. Wal-Mart*
2 *Associates, Inc.* (Case Number 17-CV-00062-LHK). I third chaired the bench trial in that same case
3 in December 2018.

4 10. I have also been certified and/or approved as class counsel in numerous other
5 wage/hour class actions. Most recently, I was certified as class counsel in the cases *Martinho v.*
6 *Amazon.com, Inc., et al.* (N.D. Cal., Case Number 4:22-cv-06849-YGR), *Garcia v. Wal-Mart*
7 *Associates, Inc., et al.* (S.D. Cal., Case Number 3:18-cv-00500-L-MDD), *Richert v. Samaritan,*
8 *LLC, et al.* (Santa Clara County Superior Court, Case Number 17CV314186), *Song v. THC –*
9 *Orange County, Inc.* (C.D. Cal., Case No. 8-17-cv-965-JLS (DFM)), *Hernandez v. Wells Fargo*
10 *Bank National Ass’n, et al* (Santa Clara County Superior Court, Case No. 16-CV-299319), and *Sims*
11 *v. QG Printing II, LLC, et al.* (C.D. Cal., Case No. ED CV 20-1632-DMG (KKx)), as part of the
12 courts’ orders granting class certification pursuant to Fed. R. Civ. P. 23 and California Code of
13 Civil Procedure § 382.

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

22 12. To date, I have incurred approximately 130.0 hours in connection with the litigation
23 of this lawsuit. Attached hereto as **Exhibit A** is a chart summarizing the amount of work I have
24 incurred to date on this matter.

25 13. I also anticipate spending an additional 8 hours handling post-approval matters,
26 including conferring and reviewing e-mails and other written communications with counsel for
27 Defendant, the Settlement Administrator, and Settlement Class Members regarding post final
28 approval matters, including payments and any potential related issues.

1 14. The total lodestar for my hours will be approximately **\$89,700.00**, based on the
2 above total hours of 138.0 (130.0 hours + 8.0 anticipated hours) at an hourly rate of \$650.00 per
3 hour.

4 15. My current billing rate is \$650.00 per hour. In 2019 and 2020, I was approved at an
5 hourly rate of \$450.00 per hour by various courts in a number of matters, including but not limited
6 to, *Lao v. H & M Hennes & Mauritz, L.P.* (N.D. Cal., Case No. 5:16:cv-333 EJD), *Hernandez v.*
7 *Wells Fargo Bank National Ass'n, et al* (C.D. Cal., Case No. 16-CV-299319), and *Abarca v. El*
8 *Estero Car Wash, Inc. et al* (Monterey County Superior Court Case No. 18CV003398). In 2021, I
9 was approved at the hourly rate of \$500.00 in various cases, including *Baker v. California Forensic*
10 *Medical Group, Inc., et al.*, Judicial Council Coordination Proceeding No. 4999 (Lead Case No.
11 17CV003723); *Mendez v. Falcon Trading Company* (Monterey County Superior Court Case No.
12 19CV004512); and *Truong v. DS Services of America, Inc.* (Solano County Superior Court Case
13 No. FCS054399).

14 16. In 2023, I was approved at the hourly rate of \$600.00 in *Moen v. Genentech,*
15 *Inc.* (San Diego Superior Court Case No. 37-2021-00008619-CU-OE-CTL) *Murray v. Granite*
16 *Wellness Centers et al.* (Nevada County Superior Court Case No. CU20-084680), *Norman v. B & H*
17 *Global Marketing, LLC* (Sacramento County Superior Court Case No. 34-2022-00314707), *Osman-*
18 *Bravard v. Placer Title Company* (Nevada County Superior Court Case No. CU21-085315), *Cabalo*
19 *v. Jones Lang LaSalle Americas, Inc.* (San Diego County Superior Court Case No. 37-2020-
20 00044322-CU-OE-CTL), and *Apex Systems Wage and Hour Cases* (Orange County Superior Court,
21 JCCP No. 5096).

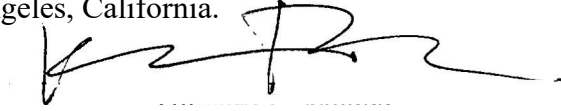
22 17. In 2025, I increased my hourly rate to \$650.00 per hour. I have been approved at
23 this rate in *Westmoreland v. Kindercare Education LLC* (N.D. Cal. Case No. 3:23-cv-03168-JD),
24 *Torres v. Fidelity National Management Services, LLC* (Santa Clara County Superior Court Case
25 No. 23CV416377), *Chiesa et al. v. Airgas USA, LLC* (Sacramento County Superior Court Lead
26 Case No. 34-2022-00325292).

27 18. My co-counsel and I will adequately represent the Class Members in this action.
28 Plaintiff's counsel has and will zealously represent Plaintiff and the Class Members and pursue this

lawsuit to its conclusion.

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

Executed on July 7, 2026, at Los Angeles, California.

A handwritten signature in black ink, appearing to read 'Mai Tulyathan', written over a horizontal line.

Mai Tulyathan

EXHIBIT A

Roberts-Cooper v. Rise Luxury
Mai Tulyathan Time and Task Chart

Hours	Description of Work
6.5	Initial research and review of background facts in preparation for filing of class action; conduct research re theories of liability; confer with co-counsel re same
4.3	Draft complaint; further review and revise same
2.0	Draft PAGA letter; confer with co-counsel and client re same
0.2	Review notice of assignment and CMC; review minute order
1.0	Review Defendant's Answer
5.6	Draft various joint statements; meet and confer for case management conferences
1.2	Draft amended PAGA letter; confer with co-counsel and client re same
2.7	Conduct witness interview; draft declaration; further review and revise same
3.5	Draft First Amended Complaint
2.0	Meet and confer re: filing of First Amended Complaint; draft stipulation re: same
3.8	Draft written discovery, Requests for Production of Documents and Special Interrogatories, Set One; further review and revise same
2.6	Draft PMK deposition notice
1.5	Meet and confer with Defendant re mediation
3.4	Draft data request for mediation; further meet and confer with Defendant's counsel re: data and document production
2.5	Meet and confer with expert re: analysis
9.4	Review data and document production; review expert analysis and run penalties analysis; meet and confer with co-counsel re analysis issues
8.6	Draft mediation brief; legal research re same; confer with client and co-counsel; review and revise same
9.0	Prepare for and attend mediation
1.2	Review and analyze mediator's proposal; confer with client and co-counsel re same
3.8	Review and revise MOU

20.4	Draft long-form settlement agreement and class notice; multiple rounds of revisions
1.8	Review and revise amendment to settlement agreement; confer with client re same
17.7	Draft motion for preliminary approval; review supporting declarations; confer with co-counsel re same
1.5	Review order granting MPA; review notice of entry of order
12.6	Review and revise motion for final approval; prepare supporting declarations; confer with client and co-counsel re same
1.2	Review and revise settlement administrator declaration in support of final approval
130.0	TOTAL HOURS