

Larry W. Lee (State Bar No. 228175)
Max W. Gavron (State Bar No. 291697)
Kwanporn “Mai” Tulyathan (SBN 316704)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile
lwlee@diversitylaw.com
mgavron@diversitylaw.com
ktulyathan@diversitylaw.com

William L. Marder (State Bar No. 170131)
bill@polarislawgroup.com
Polaris Law Group
501 San Benito Street, Suite 200
Hollister, CA 95023
(831) 531-4214
(831) 634-0333 facsimile

Attorneys for Plaintiff and the Class

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

CHRISTIE MINES, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

SOUTHERN MONTEREY COUNTY
MEMORIAL HOSPITAL, a California
nonprofit corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 24CV005289

Assigned to the Honorable Thoman W. Wills, Dept.
15)

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

Date: April 10, 2026

Time: 8:30 A.M.

Dept.: 15

Action Filed: December 12, 2024

Trial Date: Not Set

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

2 I, Kwanporn “Mai” 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 Christie Mines (“Plaintiff”). I have personal knowledge of the facts set forth below and if called
6 to testify I could and would do so competently.

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

9 3. The Joint Stipulation of Class and PAGA Settlement (“Stipulation”) was the
10 product of negotiations between highly able and experienced attorneys on both sides who
11 possessed the relevant data and extensive legal research which they had carefully analyzed. The
12 Parties engaged in arm’s length negotiations.

13 4. Class Counsel engaged in extensive factual investigation before settling, including
14 the exchange of written discovery and analysis of class data and pay records, in addition to
15 review of various policies as previously detailed.

16 5. I have spent significant time researching and pursuing the claims that have been
17 alleged in this action. Based on my independent investigations and evaluations, I am of the
18 opinion that the proposed settlement is fair, reasonable, and adequate, and is in the best interests
19 of the Settlement Class, in light of all known facts and circumstances, and the expenses and risks
20 inherent in litigation. The settlement was negotiated at arm’s length. Thus, this settlement should
21 be granted final approval.

22 6. Any remaining monies from uncashed settlement checks will be distributed to the
23 *cy pres* recipient Legal Aid at Work, in accordance with Code of Civil Procedure § 384. I do not
24 have any relationship with or connection to said organization.

25 7. My qualifications are as follows: I received my JD from Loyola Law School in
26 2017. I received the First Honors Award in Legal Research and Writing, First Honors Award in
27 Appellate Advocacy, and First Honors Award in Civil Litigation Practicum I for achieving the
28 highest grade in those classes. During law school, I was a Staff Editor for Loyola Law Review. I

1 was also an extern at the U.S. District Court, Central District of California, for the Honorable
2 Christina A. Snyder, and a certified law clerk at the San Diego County District Attorney's
3 Office, Collaborative Courts Division, and the Los Angeles County District Attorney's Office,
4 Consumer Protection and Environmental Crimes Division. In 2016, I participated in Loyola Law
5 School's Scott Moot Court Competition, where I placed Top 16 and was awarded the Top
6 Ten Brief Award. In 2017, I participated in the Employment Rights Clinic, an extension of the
7 Division of Labor Standards Enforcement created to investigate retaliation complaints. Upon
8 graduation from law school, I was admitted to the California Bar in December 2017.

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

15 9. I am currently handling and/or have handled numerous wage and hour class action
16 and PAGA lawsuits, including *Magadia v. Wal-Mart Associates, Inc., et al.* (Case Number 5:17-
17 cv-00062-LHK); *Garcia v. Wal-Mart Associates, Inc., et al.* (Case Number 3:18-cv-00500-L-
18 MDD); *Hernandez v. Wells Fargo Bank, N.A.* (Case Number 16CV299319); *Lao v. H & M*
19 *Hennes & Mauritz, L.P.* (Case Number 5:16-cv-333 EJD); *Arroyo v. Int'l Paper Company* (Case
20 Number 5:17-cv-06211-BLF); *Baker v. California Forensic Medical Group, Inc., et al.*, Judicial
21 Council Coordination Proceeding No. 4999 (Lead Case No. 17CV003723); and *Garcia v. Apex*
22 *Systems, LLC, et al.* (Case Number RG19014709).

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

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

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

11 12. Moreover, I was granted final approval as class counsel in *Lao v. H & M Hennes*
12 *& Mauritz, L.P.* (Case No. 5:16:cv-333 EJD), *Abarca v. El Estero Car Wash, Inc. et al.* (Case
13 No. 18CV003398), *Valles v. Community Hospital of the Monterey Peninsula* (Case No.
14 17CV003452), *Chavez v. Hugo Boss Retail, Inc.* (Case No. 18CV322644), *Hernandez v. Wells*
15 *Fargo Bank National Ass’n, et al.* (Case No. 16-CV-299319); *Baker v. California Forensic*
16 *Medical Group, Inc., et al.*, Judicial Council Coordination Proceeding No. 4999 (Lead Case No.
17 17CV003723); *Mendez v. Falcon Trading Company* (Case No. 19CV004512); *Truong v. DS*
18 *Services of America, Inc.* (Case No. FCS054399).

19 13. To date, I have incurred approximately 7.6 hours in connection with the litigation
20 of this lawsuit. Attached hereto as **Exhibit A** is a chart summarizing the amount of work I have
21 incurred to date on this matter.

22 14. The total lodestar for my hours will be approximately \$3,800.00, based on the
23 above total hours of 7.6 at an hourly rate of \$500.00 per hour. Typically, I bill \$600.00 for my
24 time, which is reasonable given the number of California courts that have approved me at this
25 rate. However, I apply the reduced hourly rate of \$500.00 to consider the jurisdiction wherein
26 the action is pending.

27 15. I have been approved at an hourly rate of \$500.00 per hour by various Courts, in a
28 number of matters, including, but not limited to, *Rachel Smith v. NMSO, Inc.*, Alameda County

1 Superior Court, Case No. RG18907075, *Harris v. 24 Seven, LLC*, Los Angeles County Superior
2 Court, Case No. BC720144, *Mendoza v. Planned Parenthood Mar Monte, Inc.*, Santa Clara
3 County Superior Court, Case No. 18CV329544. As of January 1, 2023, my hourly rate increased
4 to \$600.00 per hour. I have been approved at the hourly rate of \$600.00 in *Moen v. Genentech,*
5 *Inc.* (San Diego Superior Court Case No. 37-2021-00008619-CU-OE-CTL), *Murray v. Granite*
6 *Wellness Centers et al.* (Nevada County Superior Court Case No. CU20-084680), *Norman v. B*
7 *& H Global Marketing, LLC* (Sacramento County Superior Court Case No. 34-2022-00314707),
8 *Osman-Bravard v. Placer Title Company* (Nevada County Superior Court Case No. CU21-
9 085315), and *Cabalo v. Jones Lang LaSalle Americas, Inc.* (San Diego County Superior Court
10 Case No. 37-2020-00044322-CU-OE-CTL).

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

13 Executed on this 18th day of March 2026, at Los Angeles, California.

14 

15 _____
Kwanporn "Mai" Tulyathan

EXHIBIT A

Mines v. Southern Monterey County Memorial Hospital
Mai Tulyathan Time and Task Chart

Hours	Description of Work
1.5	Draft and revise first set of written discovery to Defendant; analyze and review client documents to prepare same; confer with co-counsel re same.
1.7	Analyze and review prior settlements to address potential impact on case; confer with co-counsel re same.
1.9	Further draft and revise settlement agreement; confer with co-counsel re same.
1.5	Draft and revise motion for preliminary approval and supporting declarations/documents; confer with co-counsel re same.
1.0	Draft and revise motion for final approval and supporting documents; confer with co-counsel re the same.
7.6	TOTAL HOURS