

1 Jamie Serb (SBN 289601)  
2 [jamie@crosnerlegal.com](mailto:jamie@crosnerlegal.com)  
3 Michael Jones (SBN 312831)  
4 [michael.jones@crosnerlegal.com](mailto:michael.jones@crosnerlegal.com)  
5 Zachary Crosner (SBN 272295)  
6 [zach@crosnerlegal.com](mailto:zach@crosnerlegal.com)  
7 **CROSNER LEGAL, P.C.**  
8 9440 Santa Monica Blvd., Ste. 301  
9 Beverly Hills, CA 90210  
10 Tel. (866) 276-7637  
11 Fac. (310) 510-6429

12 Attorneys for Plaintiff  
13 JIHYUN KWON

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**SUPERIOR COURT OF CALIFORNIA**  
**IN AND FOR THE COUNTY OF LOS ANGELES**

JIHYUN KWON, as an individual on behalf of  
herself and on behalf of all others similarly  
situated,

Plaintiff,

v.

WOOLTARI USA, INC., a Delaware  
corporation; and DOES 1-100, inclusive,

Defendants.

**FILED**  
Superior Court of California  
County of Los Angeles  
**06/07/2024**  
David W. Slayton, Executive Officer / Clerk of Court  
By:           M. Mata           Deputy

Case No. 22STCV37161

Assigned for All Purposes to:  
Hon. Maren E. Nelson  
Dept. SSC-17

~~[PROPOSED]~~ ORDER GRANTING  
MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT

Date: May 16, 2024  
Time: 9:00 am  
Dept.: SSC-17

1 The Court, having read the papers filed regarding Plaintiffs' unopposed Motion for  
2 Preliminary Approval of Class Action and PAGA Settlement, and having heard argument on the  
3 Motion, hereby finds and ORDERS as follows:

4 1. The Class Action and PAGA Settlement Agreement attached as Exhibit 1 to the  
5 Declaration of Jamie K. Serb in support of Plaintiff's Motion for Preliminary Approval of Class  
6 Action and PAGA Settlement, filed on or about February 6, 2024 (the "Settlement Agreement"),  
7 is within the range of possible recovery and, subject to further consideration at the Final Approval  
8 Hearing described below, is preliminarily approved as fair, reasonable, and adequate. The Court,  
9 for purposes of this Order, adopts all defined terms as set forth in the Settlement Agreement.

10 2. For purposes of settlement only, the Court provisionally and conditionally certifies  
11 the following class: "all current and former non-exempt employees that worked either directly or  
12 via a staffing agency for defendant Wooltari USA, Inc. ("Wooltari") at any location in California  
13 at any time during the Class Period" of November 23, 2018 to October 2, 2023.

14 3. The Court finds the Settlement Class, consisting of approximately 76 members, is  
15 so numerous that joinder of all members is impracticable, and that the Settlement Class is  
16 ascertainable by reference to the business records of Defendants.

17 4. The Court finds further there are questions of law and fact common to the entire  
18 Settlement Class, which common questions predominate over any individualized questions of law  
19 or fact. These common questions include, without limitation: (1) whether Wooltari properly paid  
20 Settlement Class Members for all hours worked at the correct rates, (2) whether Wooltari  
21 provided Settlement Class Members with all required meal and rest periods, (3) whether Wooltari  
22 properly reimbursed the Settlement Class Members for business expenses; (4) whether Wooltari  
23 provided Settlement Class Members with proper itemized wage statements; and (5) whether  
24 Wooltari timely paid all wages due on separation of employment.

25 5. The Court finds further the claims of named Plaintiff Jihyun Kwon are typical of  
26 the claims of the Settlement Class, and that she will fairly and adequately protect the interests of  
27 the Settlement Class. Accordingly, the Court appoints Jihyun Kwon as the Class Representative,  
28 and appoints her counsel of record, Zachary M. Crosner, Jamie K. Serb, and Michael Jones, and

1 Crosner Legal, PC, as Class Counsel.

2 6. The Court finds further that certification of the Settlement Class is superior to  
3 other available means for the fair and efficient adjudication of the controversy.

4 7. The Court finds further that, in the present case, the proposed method of providing  
5 notice of the Settlement to the Settlement Class via First Class U.S. Mail to each Settlement Class  
6 Member's last known address, is reasonably calculated to notify the Settlement Class Members of  
7 the proposed Settlement and provides the best notice possible under the circumstances. The  
8 Court also finds the Notice of Class Action Settlement form is sufficient to inform the Settlement  
9 Class Members of the terms of the Settlement and their rights thereunder, including the right to  
10 object to the Settlement or any part thereof and the procedure for doing so, their right to exclude  
11 themselves from the Settlement and the procedure for doing so, their right to obtain a portion of  
12 the Settlement proceeds, and the date, time and location of the Final Approval Hearing. The  
13 proposed Notice of Class Action Settlement (Exhibit A to the Settlement Agreement) and the  
14 procedure for providing Notice set forth in the Settlement Agreement, all are approved by the  
15 Court.

16 8. Under the terms of the Settlement Agreement, the Court approves the Parties'  
17 selection of ILYM Group, Inc. as the Settlement Administrator. The Settlement Administrator is  
18 ordered to mail the Class Notice to the Settlement Class Members via First-Class U.S. Mail as  
19 specified in the Settlement Agreement, and to otherwise carry out all other duties set forth in the  
20 Settlement Agreement. The Parties are ordered to carry out and comply with all terms of this  
21 Order and the Settlement Agreement, and particularly with respect to providing the Settlement  
22 Administrator all information necessary to perform its duties under the Settlement Agreement.

23 9. Any member of the Settlement Class who wishes to comment on or object to the  
24 Settlement or any term thereof, including any proposed award of attorney's fees and costs to  
25 Class Counsel or any proposed representative enhancement to the Class Representatives, shall  
26 have forty-five (45) days from the mailing of the Class Notice to submit his or her comments  
27 and/or objection to the Settlement Administrator, as set forth in the Settlement Agreement and  
28 Class Notice.

1           10. Any member of the Settlement Class who wishes to exclude themselves from the  
2 Settlement shall have forty-five (45) days from the mailing of the Class Notice to submit his or  
3 her Request for Exclusion to the Settlement Administrator, as set forth in the Settlement  
4 Agreement and Class Notice.

5           11. The Settlement administrator is ordered to file a declaration in advance of the Final  
6 Approval Hearing attaching and authenticating all Requests for Exclusion, if any, and further  
7 attaching and authenticating all Objections, if any.

8           12. A Final Approval Hearing is hereby set for October 17, 2024, at 9:00 a.m. in  
9 Department SSC-17 of the Los Angeles County Superior Court, to consider any objections to the  
10 Settlement, determine if the proposed Settlement should be found fair, adequate and reasonable  
11 and given full and final approval by the Court, to determine the amount of attorney's fees and  
12 costs awarded to Class Counsel, and to approve the fees and costs payable to the Settlement  
13 Administrator. All legal memoranda, affidavits, declarations, or other evidence in support of the  
14 request for final approval, the award of attorney's fees and costs to Class Counsel, and the fees  
15 and costs of the Settlement Administrator, shall be filed no later than sixteen (16) court days prior  
16 to the Final Approval Hearing. The Court reserves the right to continue the Final Approval  
17 Hearing without further notice to the Settlement Class Members.

18           13. Provided he or she has not submitted a timely and valid Request for Exclusion, any  
19 Settlement Class Member may appear, personally or through his or her own counsel, and be heard  
20 at the Final Approval Hearing regardless of whether he or she has submitted a written objection.

21  
22 Dated: 06/07/2024



23 Judge of the Superior Court

*Laura Seigle*

24 Laura A. Seigle / Judge