

1 **BRADLEY/GROMBACHER LLP**
2 Marcus J. Bradley, Esq. (SBN174156)
3 Kiley L. Grombacher, Esq. (SBN 245960)
4 Lirit A. King, Esq. (SBN 252521)
5 31365 Oak Crest Drive, Suite 240
6 Westlake Village, CA 91361
7 Phone: (805) 270-7100
8 mbradley@bradleygrombacher.com
9 kgrombacher@bradleygrombacher.com
10 lking@bradleygrombacher.com

Electronically FILED by
Superior Court of California,
County of Los Angeles
6/14/2024 3:37 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By C. Perez, Deputy Clerk

11 **THE LYON FIRM**
12 Joseph M. Lyon (SBN 351117)
13 2754 Erie Avenue
14 Cincinnati, OH 45208
15 Phone: (513) 381-2333
16 Fax: (513) 721-1178
17 Email: jlyon@thelyonfirm.com

18 **MARKOVITS, STOCK & DEMARCO, LLC**
19 Terence R. Coates (*pro hac vice*)
20 119 East Court Street, Suite 530
21 Cincinnati, OH 45202
22 Phone: (513) 665-0204
23 Fax: (513) 665-0219
24 Email: tcoates@msdlegal.com

25 *Attorneys for Plaintiff and the Proposed Class*

26
27
28
SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

MINN WOO BAE, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

PACIFIC CITY BANK,

Defendant.

Case No. 21STCV45922

(Assigned to Hon. Judge William F. Highberger,
Dept. 10)

**SUPPLEMENTAL DECLARATION OF
JOSEPH M. LYON SUPPORT OF
PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES, EXPENSES, AND
SERVICE AWARD**

DATE: June 20, 2024

TIME: 11:30 a.m.

DEPT.: 10

Complaint filed: December 16, 2022

I, Joseph M. Lyon, declare:

1 1. I am over the age of 18 and a member of proposed Class Counsel in the above-captioned
2 matter and proposed class action against Defendant Pacific City Bank (“PCB”). If called as a witness, I
3 would competently testify to the matters herein from personal knowledge.

4 2. I am filing this supplemental declaration in support of Plaintiff’s Motion for Attorneys’
5 Fees, and Expenses to submit a breakdown of the hours worked in this matter.

6 3. I am the proposed Class Counsel in this case along with Kiley Grombacher of Bradley
7 Grombacher and Terence R. Coates of Markovits, Stock & DeMarco, LLC. I have participated as counsel
8 for Plaintiff Bae from the time of investigating the case before the Complaint was filed through the present,
9 including attending both mediations.

10 4. I have monitored my firm’s and the other Plaintiff’s firms’ participation in this matter from
11 2022 to the present. I have reviewed my firm’s detailed time entries and detailed expenses and can confirm
12 that each are valid, incurred in the ordinary course of business, and were expended in this matter to assist
13 in achieving the Settlement Fund. I have also confirmed with Mr. Coates and Ms. Grombacher that they
14 have detailed time entries and receipts supporting the lodestar and expenses totals that are included in this
15 Declaration. The contents of this Declaration are based upon my own personal knowledge, my experience
16 in handling many class action cases, and the events of this litigation.

17 5. As a member of Class Counsel, my firm has been centrally involved in all aspects of this
18 litigation from the initial investigation to the present. Class Counsel and Defendant’s counsel are
19 experienced in class action litigation.

20 6. The chart below breaks down the hours worked by my firm through October 18, 2023:

21

Timekeeper	Position	Rate	Hours	Total
Joseph M. Lyon	Partner	\$795.00	75.1	\$59,704.50
Clint Watson	Associate	\$725.00	48.8	\$35,497.50
Kevin M. Cox	Associate	\$495.00	7.5	\$3,712.50
Keianna Coulter	Paralegal	\$175.00	2.6	\$455.00
TOTAL			134	\$99,369.50

22
23
24
25

26 7. Since October 18, 2023, The Firm has expended additional time toward final approval
27 and anticipates spending more time through the final resolution of this matter.

28 8. The chart below breaks down the expenses incurred by The Lyon Firm through October
18, 2023:

Expense Type	Amount
<i>Pro Hac Vice</i>	\$51.25
Mediation	\$7,564.54
TOTAL	\$7,615.79

I declare under penalty of perjury under the laws of California and the United States of America that the foregoing is true and correct. Executed this June 13, 2024, at Cincinnati, Ohio.

/s/ Joseph M. Lyon
Joseph M. Lyon