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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

KHAI TU, on behalf of himself and all others
similarly situated,

Plaintiff,

v.

UNITED DENTAL CORPORATION; UNITED
DENTAL FULLERTON CORP; UNITED
DENTAL IRVINE CORP; UNITED DENTAL
NORTHRIDGE CORP.; UNITED DENTAL
WILSHIRE CORPORATION; and DOES 1
through 300, inclusive,

Defendants

Case No. BC542678

[CLASS ACTION]

**PLAINTIFF'S STATUS REPORT RE
FUNDING/COLLECTION FOR NON-
APPEARANCE CASE REVIEW;
DECLARATION OF GERALD S. OHN**

Date: August 26, 2025

Time: 9:00 a.m.

Judge: Honorable William F. Highberger
Dept.: 1

Action Filed: April 14, 2014

1 Defendants UNITED DENTAL CORPORATION; UNITED DENTAL FULLERTON
2 CORP; UNITED DENTAL IRVINE CORP; UNITED DENTAL NORTHRIDGE CORP.;
3 UNITED DENTAL WILSHIRE CORPORATION; JEONG HOON KIM (DOE 1); UD 1227
4 W 17TH ST SANTA ANA CORP. (DOE 2); UD 18102 PIONEER BLVD ARTESIA CORP
5 (DOE 3); and UD 20150 GOLDEN SPRINGS DRIVE DIAMOND BAR, LLC (DOE 4)
6 (collectively, “Defendants”) have still not paid any amount of the outstanding Amended Final
7 Judgment in the total principal amount of \$2,445,757.60, that was approved and ordered by the
8 Court pursuant to a Class Action Settlement that Defendants breached and continue to breach.

9 After nearly 10 years of litigation, Plaintiff’s Notice of Entry of the Amended Final
10 Judgment (“Judgment”) was filed and served on or about November 1, 2023. With interest at
11 the legal rate of 10% per annum, the total outstanding amount presently owed by Defendants is
12 now a total of at least \$2,873.765.20. That amount does not include the additional costs and
13 attorneys’ fees, which Plaintiff will seek with respect to efforts that have been and will be
14 undertaken to enforce and collect on this Judgment on behalf of Plaintiff and the Class.

15 Defendants’ deadline to appeal the subject Judgment expired on or about December 31,
16 2023; and their deadline to seek to set it aside pursuant to California Civil Procedure Code
17 section 473 expired on or about May 1, 2024.

18 Class Counsel submitted a Writ of Execution to the Court with respect to the Los
19 Angeles County Sherrif, which the issued by the Clerk of the Court on March 1, 2024. Shortly
20 thereafter, Class Counsel submitted a Writ of Execution to the Court with respect to the
21 Orange County Sherrif, which was issued by the Court on or about March 4, 2024.

22 On or about March 7, 2024, Class Counsel filed and served Notice of the above Writs
23 of Execution.

24 On or about April 15, 2024, Class Counsel filed the Writ of Execution with respect to
25 Los Angeles County with the Court.

26 During the course of the underlying litigation, Class Counsel had been informed that
27 certain of the Defendants had bank accounts at Chase and Bank of Hope. Thus, as of on about
28 May 9, 2024, Class Counsel had prepared extensiye paperwork to attempt to levy on these

1 bank accounts and instructed Ace Attorney Service to serve the Notice of Levy and related
2 documents on the subject banks and defendants. On or about May 15, 2024, Ace Attorney
3 Service served the Notice of Levy and related paperwork on Chase, Bank of Hope and
4 Defendants.

5 On or about May 20, 2024, Class Counsel received a call from a Chase Bank
6 representative in response to the Notice of Levy indicating that none of the Defendants
7 currently have a bank account with Chase. Shortly thereafter, Class Counsel received a
8 confirming letter from Chase bank.

9 Class Counsel has not received a substantive response to date from Bank of Hope in
10 response to the Notice of Levy.

11 Class Counsel submitted an Abstract of Judgment to the Court, which was issued by
12 the Clerk of the Court on or about May 28, 2024. Class Counsel submitted the Abstract of
13 Judgment to the Los Angeles County Recorder's Office and it was recorded on or about
14 August 6, 2024.

15 On October 29, 2024, defendant UNITED DENTAL WILSHIRE CORPORATION
16 filed for Chapter 11 bankruptcy in the United State Bankruptcy Court for the Central District
17 of California Case No. No. 24-18873-WB.

18 On November 3, 2024, defendant UNITED DENTAL FULLERTON CORP also filed
19 for Chapter 11 bankruptcy in the United State Bankruptcy Court for the Central District of
20 California Case No. 24-19069-WB.

21 On or about January 13, 2025, counsel for Plaintiff Khai Tu and the Class timely filed
22 claims with respect to the Amended Final Judgment in the above bankruptcy proceedings.
23 Thereafter, Class Counsel engaged in settlement negotiations via telephone, Zoom and email
24 with attorney JAENAM J. COE, who was counsel for debtor defendants UNITED DENTAL
25 WILSHIRE CORPORATION and UNITED DENTAL FULLERTON CORP in the above
26 bankruptcy proceedings. However, no agreement in principle as to any settlement was reached
27 that could be presented to this Court for consideration.

28 Indicative of the bad faith conduct exhibited by Defendants throughout this now over

1 11-year litigation, on April 22, 2025, defendant UNITED DENTAL WILSHIRE
2 CORPORATION filed a Motion to Dismiss the Bankruptcy, which was granted by the
3 Bankruptcy Court on or about May 22, 2025. On April 22, 2025, defendant UNITED
4 DENTAL FULLERTON CORP filed a Motion to Dismiss the Bankruptcy, which was granted
5 by the Bankruptcy Court on May 23, 2025. Class Counsel had received notices with respect to
6 these orders in the mail as of on or about June 1, 2025.

7 Thereafter, Class Counsel has been in communications with collection attorneys
8 regarding possibly associating one in, subject to Court approval, to assist in efficiently and
9 aggressively pursuing additional collection efforts against these grossly recalcitrant
10 Defendants. In that regard, Class Counsel is in communication with collections attorney
11 Gregory Groenvald. In addition, Class Counsel is also in communication with attorneys based
12 and licensed in New York with a focus on collections as Class Counsel is informed that
13 defendant Jeong Hoon Kim has a residence and potentially other collectible assets/real
14 property in New York. In that regard, Class Counsel is in communication with and has a
15 conference call scheduled with New York based and licensed attorney Adam Pollock for
16 August 25, 2025. Class Counsel is also in communication with New York based and licensed
17 attorney Jeff Lee.

18 Moreover, Class Counsel submitted the Abstract of Judgment to the Orange County
19 Recorder's Office and it was recorded on or about August 20, 2025.

20 In addition to the foregoing, Class Counsel plans to, *inter alia*, take the following
21 actions to collect on the Judgment. Class Counsel will serve Interrogatories and Inspection
22 Demands on each of the Defendants to specific information about their collectible assets both
23 inside and outside of California to facilitate collecting on same and aid in enforcement
24 of the Judgment. If Defendants do not timely and properly respond to the Interrogatories and
25 Inspection Demands, Class Counsel will file motions to compel.

26 Shortly after receipt of the responses to the Interrogatories and Inspection Demands,
27 Class Counsel will file Applications with this Court for debtor's exams of all Defendants to
28 take place at the Los Angeles Superior Court.

1 Following completion of the debtors' exams of Defendants, Class Counsel plans to
2 seek a Turnover Order from the Court as collectible assets inside and outside of California as
3 appropriate. Cal. Civ. Proc. § 708.205.

4 Following completion of the debtors' exams of Defendants, Class Counsel plans to
5 seek a Charging Order from the Court as to individual defendant JEONG HOON KIM's assets
6 in other partnerships or LLCs as appropriate. Cal. Civ. Proc. Code § 699.720(a)(2); Cal. Civ.
7 Proc. Code § 708.310.

8 After receipt of any additional information as to collectible assets such as bank account
9 numbers and/or personal property, Class Counsel plans to levy on all additional identified bank
10 accounts. Moreover, Class Counsel will file a notice of judgment lien with the California
11 Secretary of State.

12 After receipt of any additional pertinent information, Class Counsel plans to file a
13 motion with the Court for an Assignment Order with respect to Defendants' rights to payments
14 due from third-parties. Cal. Civ. Proc. Code § 708.610.

15 After receipt of pertinent required information, Class Counsel will seek to garnish the
16 wages of individual defendant Jeong Hoon Kim.

17
18 Dated: August 22, 2025

Respectfully submitted,

19 LAW OFFICES OF GERALD S. OHN, APC
20 LAW OFFICE OF YOUNG W. RYU

21 */s/ Gerald S. Ohn*

22 By: _____

23 Gerald S. Ohn
24 Young W. Ryu
25 Attorneys for Plaintiff and the Class
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27
28

DECLARATION OF GERALD S. OHN

I, Gerald S. Ohn, declare as follows:

I am an attorney at law duly licensed to practice law in California. I am an attorney for plaintiff KHAI TU (“Plaintiff”) and the Class in this action, along with my co-counsel Young W. Ryu (“Class Counsel”). I have personal knowledge of all facts contained in this declaration, except where otherwise specified. If called to testify on any fact contained in this declaration, I would be competent to do so.

1. Defendants UNITED DENTAL CORPORATION; UNITED DENTAL FULLERTON CORP; UNITED DENTAL IRVINE CORP; UNITED DENTAL NORTHRIDGE CORP.; UNITED DENTAL WILSHIRE CORPORATION; JEONG HOON KIM (DOE 1); UD 1227 W 17TH ST SANTA ANA CORP. (DOE 2); UD 18102 PIONEER BLVD ARTESIA CORP (DOE 3); and UD 20150 GOLDEN SPRINGS DRIVE DIAMOND BAR, LLC (DOE 4) (collectively, “Defendants”) have still not paid any amount of the outstanding Amended Final Judgment in the total principal amount of \$2,445,757.60.

2. Plaintiff’s Notice of Entry of the Amended Final Judgment (“Judgment”) was filed and served on or about November 1, 2023.

3. Class Counsel submitted a Writ of Execution to the Court with respect to the Los Angeles County Sherrif, which the issued by the Clerk of the Court on March 1, 2024. Shortly thereafter, Class Counsel submitted a Writ of Execution to the Court with respect to the Orange County Sherrif, which was issued by the Court on or about March 4, 2024.

4. On or about March 7, 2024, Class Counsel filed and served Notice of the above Writs of Execution.

5. On or about April 15, 2024, Class Counsel’s attorney service filed the Writ of Execution with respect to Los Angeles County with the court.

6. During the course of the underlying litigation, Class Counsel had been informed that certain of the Defendants had bank accounts at Chase and Bank of Hope. Thus, as of on about May 9, 2024, I had prepared extensive paperwork to attempt to levy on these bank accounts and instructed Ace Attorney Service to serve the Notice of Levy and related

documents on the subject banks and defendants.

7. On or about May 15, 2024, Ace Attorney Service served the Notice of Levy and related paperwork on Chase, Bank of Hope and Defendants. Attached as **Exhibit A** is a true and correct copy of a Proof of Service as to Chase Bank and Defendants. Attached as **Exhibit B** is a true and correct copy of a Proof of Service as to Bank of Hope and Defendants.

8. On or about May 20, 2024, I received a call from a Chase Bank representative in response to the Notice of Levy indicating that none of the Defendants currently have a bank account with Chase. Shortly thereafter, I received a confirming letter from Chase bank. Attached as **Exhibit C** is a true and correct copy of said letter that I received from Chase Bank dated May 22, 2024.

9. Class Counsel has not received a substantive response to date from Bank of Hope in response to the Notice of Levy.

10. Class Counsel submitted an Abstract of Judgment to the Court, which was issued by the Clerk of the Court on or about May 28, 2024. Class Counsel's attorney service submitted the Abstract of Judgment to the Los Angeles County Recorder's Office and it was recorded on or about August 6, 2024. Attached as **Exhibit D** is a true and correct recorded copy of said Abstract of Judgment.

11. On October 29, 2024, defendant UNITED DENTAL WILSHIRE CORPORATION filed for Chapter 11 bankruptcy in the United State Bankruptcy Court for the Central District of California Case No. No. 24-18873-WB.

12. On November 3, 2024, defendant UNITED DENTAL FULLERTON CORP also filed for Chapter 11 bankruptcy in the United State Bankruptcy Court for the Central District of California Case No. 24-19069-WB.

13. On or about January 13, 2025, I timely filed claims with respect to the Amended Final Judgment on behalf of Plaintiff and the Class in the above bankruptcy proceedings.

14. Thereafter, Class Counsel engaged in settlement negotiations via telephone, Zoom and email with attorney JAENAM J. COE, who was counsel for debtor defendants UNITED DENTAL WILSHIRE CORPORATION and UNITED DENTAL FULLERTON CORP in the

1 above bankruptcy proceedings. However, no agreement in principle as to any settlement was
2 reached that could be presented to this Court for consideration.

3 15. On April 22, 2025, defendant UNITED DENTAL WILSHIRE CORPORATION
4 filed a Motion to Dismiss the Bankruptcy, which was granted by the Bankruptcy Court on or
5 about May 22, 2025. On April 22, 2025, defendant UNITED DENTAL FULLERTON CORP
6 filed a Motion to Dismiss the Bankruptcy, which was granted by the Bankruptcy Court on May
7 23, 2025. Class Counsel had received notices with respect to these orders in the mail as of on
8 or about June 1, 2025.

9 16. Class Counsel has been in communications with collection attorneys regarding
10 possibly associating one in, subject to Court approval, to assist in efficiently and aggressively
11 pursuing additional collection efforts against these grossly recalcitrant Defendants. In that
12 regard, Class Counsel is in communication with collections attorney Gregory Groenvald. In
13 addition, Class Counsel is also in communication with attorneys based and licensed in New
14 York with a focus on collections as Class Counsel is informed that defendant Jeong Hoon Kim
15 has a residence and potentially other collectible assets/real property in New York. In that
16 regard, Class Counsel is in communication with and has a conference call scheduled with
17 attorney Adam Pollock for August 25, 2025. I am informed and believe that Adam Pollock
18 New York based and licensed. I am also in communication with attorney Jeff Lee who I am
19 informed is a New York based and licensed attorney Jeff Lee.

20 17. Class Counsel's attorney service submitted the Abstract of Judgment to the Orange
21 County Recorder's Office and it was recorded on or about August 20, 2025. Attached as
22 **Exhibit E** is a true and correct recorded copy of said Abstract of Judgment.

23 18. In addition to the foregoing, Class Counsel plans to, *inter alia*, take the following
24 actions to collect on the Judgment. Class Counsel will serve Interrogatories and Inspection
25 Demands on each of the Defendants to specific information about their collectible assets both
26 inside and outside of California to facilitate collecting on same and aid in enforcement
27 of the Judgment. If Defendants do not timely and properly respond to the Interrogatories and
28 Inspection Demands, Class Counsel will file motions to compel.

19. Shortly after receipt of the responses to the Interrogatories and Inspection Demands, Class Counsel plans to file Applications with this Court for debtor's exams of all Defendants to take place at the Los Angeles Superior Court.

20. Following completion of the debtors' exams of Defendants, Class Counsel plans to seek a Turnover Order from the Court as collectible assets inside and outside of California as appropriate.

21. Following completion of the debtors' exams of Defendants, Class Counsel plans to seek a Charging Order from the Court as to individual defendant JEONG HOON KIM's assets in other partnerships or LLCs as appropriate.

22. After receipt of any additional information as to collectible assets such as bank account numbers and/or personal property, Class Counsel plans to levy on all additional identified bank accounts. Moreover, Class Counsel will file a notice of judgment lien with the California Secretary of State.

23. After receipt of any additional pertinent information, Class Counsel plans to file a motion with the Court for an Assignment Order with respect to Defendants' rights to payments due from third-parties. Cal. Civ. Proc. Code § 708.610.

24. After receipt of pertinent required information, Class Counsel plans to seek to garnish the wages of individual defendant Jeong Hoon Kim.

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

Executed on August 22, 2025 in the United States of America.

/s/ Gerald S. Ohn

Gerald S. Ohn