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Attorneys for Plaintiff JOY OLIVER-BANKS,
in a Representative capacity only, and on behalf
of other members of the general public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF IMPERIAL

JULIA TORRES, JOSE GOMEZ, and JOY
OLIVER-BANKS in a Representative capacity
only, and on behalf of other members of the
general public similarly situated,

Plaintiffs,

v.

MANAGEMENT & TRAINING
CORPORATION, a Delaware Corporation; and
DOES 1-10, inclusive

Defendants

Case No.: ECU003320

Honorable Jeffrey Jones
Department 5

**DECLARATION OF ALEXANDER
AROESTE IN SUPPORT OF
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

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I, Alexander J. Aroeste, declare:

1. I am an attorney licensed to practice law in the state of California and have been admitted to practice before this Court. I am an attorney with the law firm Lavi & Ebrahimian, LLP, Counsel for Plaintiff Joy Oliver-Banks (“Plaintiff”) in this action, and I am an attorney assigned to work on this case. Based on my assignment to this case and familiarity with the file and action in this matter, I have personal knowledge of the matters stated herein and if called and sworn as a witness, I would and could competently testify under oath thereto. I am a member in good standing of all State and Federal District Courts of California.

2. This Declaration is submitted in support of Plaintiffs' Motion for Preliminary Approval of the Class Action and PAGA Settlement.

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3. The attorneys at our office are experienced and qualified to evaluate the class claims and to evaluate settlement versus trial on a fully informed basis, and to evaluate the viability of the defenses. The partner of the firm who was lead counsel on this matter, Mr. Joseph Lavi, has been practicing law for over twenty years. Mr. Vincent Granberry, another senior attorney with our firm, graduated from Arizona State University Sandra Day O'Connor College of Law in 2010 and has been practicing law for over thirteen years. Mr. Lavi, Mr. Granberry, myself, and the other members of my firm, have almost exclusively practiced in the area of labor and employment law. Mr. Lavi has handled numerous cases in all aspects of employment and labor law, including state and federal class actions, including wrongful termination, retaliation, and harassment actions. Mr. Granberry has been in practice with the law firm of Lavi & Ebrahimian, LLP since April 2014. Super Lawyers Magazine has selected Mr. Granberry as a Southern California Rising Star in 2016 through 2025 in the area of Plaintiff's employment litigation and as one of the Up-and-Coming 100 attorneys in the same field in 2018 and again from 2020 - 2024. Mr. Granberry has been involved in numerous cases in all aspects from trial through trial and appeal, including California and Federal class actions, wrongful termination, discrimination, harassment and retaliation cases. Mr. Lavi has tried both labor and

1 employment cases in State and Federal court, and has argued before various Court of Appeals, on
2 employment issues such as validity of Arbitration Agreements, Application of Res Judicata in class
3 action cases as well as other employment issues. Mr. Lavi has also been a panelist and/or speaker for
4 various Employment Law Continuing Legal Education Panels on issues of employment law trials,
5 how to proceed and conduct trials as well as proving and winning punitive damages. Mr. Lavi has
6 also been named a Southern California Super Lawyer in the area of Plaintiff's employment litigation-
7 class action from 2011-2025. Mr. Lavi has been approved as class counsel by both federal and state
8 Courts. Mr. Lavi, Mr. Granberry, myself, and the other attorneys at Lavi & Ebrahimian who are
9 available to assist us in this case if needed are fully capable of adequately and fairly representing
10 Plaintiffs and the proposed class in this matter. Lavi & Ebrahimian, LLP, has been appointed Class
11 Counsel in over fifty contested proceedings including the following:

12 a. *Ischak v. Kaiser Foundation Hospitals, Inc.*, Los Angeles Superior Court Case
13 No. BC343535;

14 b. *Santana v. El Pollo Loco, Inc.*, Los Angeles Superior Court Case No.
15 BC369846;

16 c. *Edlin, et al. v. Fuddruckers, Inc.*, United States District Court, Central District
17 of California, Case No. CV-07-3678-ABC;

18 d. *Chavez, et al. vs. CEC Entertainment, Inc. d/b/a Chukee-Cheeses*, Los Angeles
19 Superior Court Case No. BC380996;

20 e. *Bustamante, et al. v. Teamone Employment Specialists*, Los Angeles Superior
21 Court Case No. BC383266;

22 f. *Cervantes, et al. v. Kaiser Foundation Hospitals, Inc.*, Alameda Superior Court
23 Case No. RG 0265835;

24 g. *Seng Savang v. Club One Casino*; Fresno Superior Court Case No.
25 05CECG02189;

26 h. *Norman, et al. v. Movado Retail Group, Inc.*, United States District Court,
27 Central District of California, Case No. CV08-06691 SVW (PLA);
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- 1 i. *Shand v. G.A.L.A., Inc. dba Giorgio Armani*, Los Angeles Superior Court Case
2 No. BC342588;
- 3 g. *Solis v. Plycraft Industries, Inc.*, Los Angeles Superior Court Case No.
4 BC374816;
- 5 h. *Campos v. HWB Carwash, Inc.*, Los Angeles Superior Court Case No.
6 BC378990;
- 7 i. *Acosta, et al. v. Texwood Industries*, United States District Court, Central
8 District of California, Case No. CV07-3237-DDP (PLAX);
- 9 h. *Arevalo v. Gruma Corporation*, Los Angeles Superior Court Case No.
10 BC410322;
- 11 j. *Burrola v. American Promotional Events*, Los Angeles Superior Court Case
12 No. BC412315;
- 13 k. *Cortez v. Trader Distribution Services*, Los Angeles Superior Court Case No.
14 BC397208;
- 15 l. *Cueva v. Allied Industries, Inc.*, Los Angeles Superior Court Case No.
16 BC399431;
- 17 m. *Del Toro v. Petco Animal Supplies, Inc.*, San Diego Superior Court Case No.
18 37-2009-00103626-CU-OE-CTL;
- 19 n. *Garcia v. Home Cooking, Inc.*, Los Angeles Superior Court Case No.
20 BC451148;
- 21 o. *Alcantar v. Amerimax Building Products, Inc.*, United States District Court,
22 Central District of California, Case No. CV 10-8916 DDP (CWx);
- 23 p. *Arancivias v. Clougherty Packaging, LLC dba Farmer John*, Los Angeles
24 Superior Court Case No. BC432406;
- 25 q. *Barajas v. Menzies Aviation, Inc.*, United States District Court, Central District
26 of California, Case No CV-10-02315-JEM;
- 27 r. *Barrera v. BHFC Operating, LLC dba Bottega Louie*, Los Angeles Superior
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1 Court Case No. BC462603;

2 s. *Camacho v. American Textile Maintenance Co.*, Los Angeles Superior
3 Court Case No. BC452570;

4 t. *Cortes v. Monsanto Company*, Ventura Superior Court Case No. 56-2010-
5 00366952-CU-OE-VTA;

6 u. *Escobar v. Aero-Electric Connector, Inc.*, Los Angeles Superior Court Case
7 No. BC421009;

8 v. *Gomez v. Bacara Resort & Spa*, Santa Barbara Superior Court Case No.
9 1341987;

10 w. *Gonzalez v. Ashley Furniture Industries, Inc.*, Los Angeles Superior Court
11 Case No. BC425708;

12 x. *Gonzalez v. Burrtec Waste Industries, Inc.*, Los Angeles Superior Court Case
13 No. BC436879;

14 y. *Gutierrez v. Visterra Credit Union*, Riverside Superior Court Case No.
15 RIC10020183;

16 z. *Hernandez v. Kruse & Son, Inc.*, Los Angeles Superior Court Case No.
17 BC411849;

18 aa. *Lopez v. Tecno Industrial Engineering*, Los Angeles Superior Court Case No.
19 BC411134;

20 bb. *Lowanga v. Continental Currency Services, Inc.*, Orange County Superior
21 Court Case No. 30-2011-0044011-CU-OE-CXC;

22 cc. *Aguilar v. PLS Financial Services, Inc.*, United States District Court, Central
23 District of California, Case No. CV 10-0415 ODW (FMOx)

24 dd. *Lozada v. Classic Party Rentals, Inc.*, Los Angeles Superior Court Case No.
25 BC443792;

26 ee. *Madrid v. OPI Products, Inc.*, Los Angeles Superior Court Case No.
27 BC451489;

1 ff. *Martinez v. J. Fletcher Creamer & Son, Inc.*, United States District Court Case
2 No. CV 10-0968-PSG-FMOX;

3 gg. *Martinez v. Administaff Companies II, L.P.*, Los Angeles Superior Court Case
4 No. BC425799;

5 hh. *Martinez v. Morgans Hotel Group Management, LLC*, Los Angeles Superior
6 Court Case No. BC446744;

7 jj. *Sanchez v. La Brea Bakery, Inc.*, Los Angeles Superior Court Case No.
8 BC456420;

9 ii. *Montenegro v. Ruggeri Marble and Granite, Inc.*, United States District Court,
10 Central District of California, Case No. CV-10-00711 JFW (PLAx);

11 kk. *Reed v. 99 Cents Only Stores*, Los Angeles Superior Court Case No.
12 BC436793;

13 ll. *Santos v. Noble Management Group-California, LLC*, United States District
14 Court, Central District of California, Case No. CV 10-2594 DSF (VBKx)

15 mm. *Taylor v. U.S. Healthworks Holding Company, Inc.*, Orange County Superior
16 Court Case No. 30-2011-00473505;

17 nn. *Valencia Diaz v. Gene Wheeler Farms, Inc.*, Los Angeles Superior Court Case
18 No. BC436235;

19 oo. *Zad-Behtooie v. Valley Village*, Los Angeles Superior Court Case No.
20 BC451490;

21 pp. *Bell v. Aidells Sausage Company, Inc.*, Alameda Superior Court Case No.
22 RG10523946;

23 qq. *Negrete v. Cenveo, Inc.*, United States District Court, Central District of
24 California, Case No. CV 11-09543 DSF (MRWx);

25 rr. *Bejar v. Exopack-Ontario, Inc.*, Orange County Superior Court Case No. 30-
26 2011-00518396-CU-OE-CXC;

27 ss. *Aguilar v. PLS Financial Services, Inc.*, United States District Court, Central
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1 District of California, Case No. CV 10-0415 ODW (FMOx);

2 tt. *Sparks v. Larry Flynt dba Hustler Casino*, Los Angeles Superior Court Case
3 No. BC320172;

4 uu. *Morris v. Chevron Stations, Inc.*, Los Angeles Superior Court Case No.
5 BC361380;

6 vv. *Marino v. BP West Coast Products, LLC*, Los Angeles Superior Court Case
7 No. BC357987.

8 **CONTRIBUTION OF PLAINTIFF AND REASONABLENESS OF THE REQUESTED**

9 **ENHANCEMENT AWARD:**

10 4. It is imperative that Plaintiff obtain just compensation for the time, effort and risk
11 associated with his fiduciary duties as a class representative and named Plaintiff. I believe that the
12 named Plaintiff performed considerable services on behalf of the Class, since she searched for an
13 attorney, collected and gathered the requested documents and information, wage statements and/or
14 pay stubs, met with us, made himself available each and every single time that we called his in order
15 to answer questions about Defendant MANAGEMENT & TRAINING CORPORATION's
16 ("Defendant") policies and procedures produced in discovery or discussed during conversations with
17 opposing counsel or raised in pleadings filed in this matter. The named Plaintiff provided Class
18 Counsel with factual information needed to prepare the complaints. She collected relevant documents
19 and produced those documents to Class Counsel. She continued to be engaged in continued
20 settlement negotiations that were ultimately required to reach a settlement in this case. I believe that
21 the service award request of \$9,500 to Plaintiff ("Class Representative Service Payment") as a service
22 award is fair and reasonable. As such, the requested payment is warranted for her time and effort
23 when the class members are able to receive significant benefits for his efforts, as well as the fact that
24 she put herself at significant risk for liability for costs in this matter if Defendant was the prevailing
25 party in the litigation as well as for retaliation by other employers who may discover and find it to be
26 unappealing that she was class representative in a lawsuit against Defendant, her former employers.

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At this point in the approval process, the requested service payment should be approved to allow the Class Members an opportunity to object to the requested Class Representative Service Payment.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 10th day of December 2025, at Beverly Hills, California.

/s/ Alexander J. Aroeste
Alexander J. Aroeste