

COHELAN KHOURY & SINGER

Isam C. Khoury (SBN 58759)

ikhoury@ckslaw.com

Michael D. Singer (SBN 115301)

msinger@ckslaw.com

J. Jason Hill (SBN 179630)

jhill@ckslaw.com

605 C Street, Suite 200

San Diego, CA 92101

Telephone: (619) 595-3001/Facsimile: (619) 595-3000

DAVTYAN LAW FIRM, INC.

Emil Davtyan (SBN 299363)

support@davtyanlaw.com

880 E. Broadway

Glendale, CA 91205

Telephone: (818) 875-2008/Facsimile: (818) 722-3974

Attorneys for Plaintiff Gail Wilkerson, on behalf of herself, and all other similarly-situated employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN DIEGO

GAIL WILKERSON, on behalf of herself
and all other similarly-situated employees,

Plaintiff,

v.

INTUIT, INC., a Delaware Corporation; and
DOES 1 through 100, Inclusive,

Defendants.

Case No. 37-2020-00030371-CU-OE-CTL
ASSIGNED FOR ALL PURPOSES TO:
The Honorable Gregory W. Pollack
Department C-71

CLASS ACTION

**DECLARATION OF EMIL DAVTYAN IN
SUPPORT OF MOTION FOR ORDER
GRANTING PRELIMINARY APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT**

Date: September 30, 2022

Time: 9:30 a.m.

Dept: C-71

Judge: Honorable Gregory W. Pollack

Reservation: 2501884

[IMAGED FILE]

Complaint filed: August 28, 2020

Trial date: Not set

1 I, Emil Davtyan, declare:

2 1. I am an attorney duly licensed to practice law in the State of California and am a
3 member in good standing with the State Bar of California. I am co-counsel for the class action
4 with named Plaintiff Gail Wilkerson and have personal knowledge of the facts thereto. If called
5 as a witness, I could and would competently testify herein.

6 2. I graduated from the Woodbury University in 2008 with a bachelor's degree in
7 Business Finance with highest honors, as the top student in my class. I graduated from
8 Southwestern Law School in 2014 in the top 10% of my class. I am currently the managing
9 attorney in Davtyan Law Firm in Glendale, California.

10 3. My legal experience since becoming a member of the California State Bar has
11 been exclusively devoted to the practice of California and federal employment law. My office
12 almost exclusively represents plaintiffs in wage and hour actions with the same or similar
13 causes of actions brought forth in the matter pending before this Court.

14 4. I have been actively participating in the prosecution and successful settlement of
15 multiple wage and hour class action lawsuits, helping to recover wages and penalties on behalf
16 of tens of thousands of class members. My office has been appointed as Class/PAGA Counsel
17 in several class/PAGA actions, including *De La Rosa v. The Coca Cola Company et al.*
18 (Superior Court of California in Napa, 17CV000787), *Harvey v. Bed Bath & Beyond of*
19 *California Limited Liability Company* (Superior Court of California in Alameda, RG17885153),
20 *Paredes v. Bottling Group LLC et. al.* (Superior Court of California in Kern), *Ramirez v. Harris*
21 *Ranch Beef Company* (Superior Court of California in Fresno, 16CECG04103), *Gates v. Gate*
22 *Gourmet, Inc. et. al.* (Southern District of California, 16-cv-01084-L-AGS), *Hargrave v.*
23 *Antelope Valley Hospital* (Superior Court of California in Los Angeles, BC663252), *Ramirez v.*
24 *Milton Roy et. al.* (Superior Court of California in Los Angeles, BC 632 276), *Hawkins v.*
25 *AvalonBay Communities* (Superior Court of California in Santa Clara, 17CV316492), *Jones*
26 *Tharpe et al. v. Sprint Corporation et al.* (Superior Court of California in Los Angeles,
27 BC644645), *Ortega et al. v. Nestle Waters North America, Inc. et al.* (Superior Court of
28 California in Los Angeles, BC623610), *Schultz v. Jimbo's Natural Family, Inc.* (Superior Court

of California in San Diego, 37-2017-00022348-CUE-OE-CTL), *Ambrose v. Victor Valley Global et al.* (Superior Court of California in San Bernardino, CIVDS1709289), *Puerta-Gildardo v. Real Time Staffing Services LLC et. al.* (Superior Court of California in Los Angeles, BC565445), *Vargo v. Pregis Innovative Packaging LLC* (Superior Court of California in Tulare, 270836), *Conlin v. Aegis Senior Communities LLC* (Northern District of California, 17-cv-05534-LHK), *Galarza v. Kloeckner Metals Corporation* (Central District of California, 2:17-cv-04910-FMO), *Estes v. L3 Technologies, Inc. et al.* (Southern District of California, 3:17-cv-02356-H-JMA), *Rowser v. Trunk Club, Inc.* (Central District of California, 2:17-cv-05064-DSF-RAO), *Leach v. The Claremont Colleges, Inc.* (Superior Court of California in Los Angeles, BC686451), *Vaesau v. PCT Enterprises, Inc. dba Precision Cabinets* (Superior Court of California, County of Contra Costa MSC18-02404), *Terry v. TF Louderback, Inc. dba Bay Area Beverage Company* (Superior Court of the State of California, County of Contra Costa, MSC18-00859), *Roach v. Westcare California, Inc.* (Superior Court of California in Kern County, BCV-17-102367-SDS), *Patton v. Church & Dwight Co., Inc.* (Central District of California, EDCV 18-903-MWF (KKx)), among others.

5. My office has been counsel of record in a number of pending wage and hour class/PAGA action lawsuits, including *Trevino v. Golden State FC LLC et al.* (Eastern District of California, 1:18-cv-00120-DAD (BAM)), *Moriana v. Viking River Cruises* (Superior Court of California in Los Angeles, BC 687325), *Garcia v. Statewide Traffic Safety and Signs, Inc.* (Superior Court of California in Orange County, 30-2018-01011814-CU-OE-CXC), *Arellano v. Lopez & Arteaga, Inc. et al.* (Superior Court of California in Santa Clara, 17CV313029), *Juarez v. ISL Employees, Inc.* (Superior Court of California in Madera, MCV074787), *Cummings v. Eureka Restaurant Group LLC* (Superior Court of California in Santa Barbara, 18CV000849), *Cruz v. Talentscale LLC* (Superior Court of California in Riverside County, RIC1821842), *Tolbert v. Northbay Healthcare Corporation* (Superior Court of California in Solano County, FCS051565), *Cruz v. Dignity Health dba Bruceville Terrace* (Superior Court of California in Sacramento County, 34-2018-00245506), among others.

This document was executed on March 4, 2022 in Glendale, California.


Emil Davtyan