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Attorneys for Plaintiff EVA YANEZ, on behalf of herself
and all others similarly situated

SUPERIOR COURT OF CALIFORNIA**FOR THE COUNTY OF SANTA CLARA**

EVA YANEZ, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

GARDNER FAMILY HEALTH
NETWORK, INC., a California corporation;
and DOES 1 through 10, Inclusive,

Defendants

Case No. 20CV364033

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Theodore C. Zayner
Department 19

CLASS ACTION**DECLARATION OF SAHAG MAJARIAN II IN SUPPORT OF MOTION FOR AN ORDER GRANTING FINAL APPROVAL OF CLASS ACTION SETTLEMENT****Hearing Set by September 21, 2023 Order**

Date: December 6, 2023

Time: 1:30 p.m.

Dept: 19

Judge: Hon. Theodore C. Zayner

Complaint filed: February 24, 2020

Trial date: Not set

DECLARATION OF SAHAG MAJARIAN II

I, SAHAG MAJARIAN II, hereby declare:

1. I am an attorney duly licensed to practice in the State of California and am the principal of the Law Offices of Sahag Majarian II, one of the attorneys of record for Plaintiff Eva Yanez in this action against Defendant Gardner Family Health Network, Inc. I have personal knowledge of the following, and if called and sworn as a witness, I could and would competently testify thereto. This declaration is made in support of final approval of the class action settlement in this case.

2. I graduated from Loyola Law School in 1990. Since my graduation, I have been in private practice primarily representing consumers against insurance companies and workers against their employers. I have devoted a significant portion of my practice to employment law and class actions, and have been appointed co-class counsel for the plaintiffs in no less than 300 wage and hour class actions. A sample of these cases are: *Ayvazi v. Ralph Grocery Company*, LASC Case No. BC 382980; *Sandoval vs. Chevron Stations, Inc.*, MCSC Case No. CV 061690; *Nieves v. Roy's Worldwide, Inc.*, OCSC Case No. 06CC0076; *Corado v. Good Year Rubber Corp.*, SBSC Case No. RCV095476; *Pleitez v. Johnson Controls*, LASC Case No. BC353315; *Serrano v. BCI Coca Cola Bottling Co. of L.A.*, LASC Case No. BC349904; *Urbina v. Valley Crest Co.*, LASC Case No. BC356023; *Moraza v. OK International*, OCSC Case No. 06CC0148; *DeLuna v. Target*, LASC Case No. BC353080; *Daglian v. Staples, Inc.*, LASC Case No. BC375325; *McCoy v. Kimko*, OCSC Case No. 07CC00007; *Ayvazi v. Ralphs Grocery Company*, LASC Case No. BC382980; *Razo v. C & D Zodiac, Inc.*, OCSC Case No. 07-CC01373; *Sandoval v. Chevron Stations, Inc.* MCSC Case No. CV061690; and *Gomez v. Spenuzza, Inc. et al*, RCSC Case No RIC524075.

3. In the employment class action arena, I have participated in over 300 class action mediations. My participation has included extensive preparation, development of thorough knowledge of the legal issues related to certification and liability, and full immersion and participation in the mediation and negotiation process. I have also been designated co-class counsel in various cases where we prevailed in contested class certification motions. These

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cases include *Herrera v. Mountain Meadow Mushroom Farms, Inc.*, SDCSC Case No. 37-2009-00092416-CU-MT-CTI; *Aguirre v. California Drop Forge, Inc.*, LASC Case No. BC374521; *Marroquin v. Swissport North America, Inc.*, LASC Case No. BC390001; and *Romero v. Hydraulics International, Inc.*, LASC Case No. 19STCV04463.

4. Throughout my thirty-two year career in law, my practice has been exclusively contingent fee work. Within the class action arena, I have been designated co-class counsel in no less than 30 class actions that have settled for over \$1 million each.

5. My involvement in this case has included legal research, investigation, extensive preparation, development of a thorough knowledge of the legal issues related to certification and liability, and full immersion and preparation for the mediation against Defendant. The settlement in this case was reached after extensive negotiations following a full day mediation with an experienced and well respected mediator the Honorable Maria-Elena James. Based upon the totality of circumstances, I believe that the result achieved in this case is an extremely good outcome for all class members.

6. My endorsement of the settlement is without reservation. Based on my experience as Class Counsel, totality of circumstances and the legal and factual realities presented in this case, I believe the proposed settlement is fair, reasonable and adequate for the class. As a result of my prior experience as class counsel in other class actions, I am fully aware of the responsibilities I owe as Class Counsel to the Class in this action.

7. My law office undertook this matter on a purely contingent fee basis with no guarantee that the time expended would result in any recovery or recoupment of costs. Throughout my involvement in this case, I have spent a total of 47.30 hours in this case. Based on my rate of \$850 per hour, my unadjusted lodestar amount would be \$40,205.00.

8. I have incurred nominal costs in this case that are being waived.

Executed on November 7, 2023 at Tarzana, California.

DocuSigned by:
Sahag Majarian
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Sahag Majarian II