

COHELAN KHOURY & SINGER
605 C Street, Suite 200
San Diego, CA 92101

COHELAN KHOURY & SINGER

Michael D. Singer (SBN 115301)

msinger@ckslaw.com

Jeff Geraci (SBN 151519)

jgeraci@ckslaw.com

605 C Street, Suite 200

San Diego, CA 92101

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

LAW OFFICES OF SAHAG MAJARIAN II

Sahag Majarian II (SBN 146621)

sahagii@aol.com

18250 Ventura Blvd.

Tarzana, CA 91356

Tel: (818) 609-0807/Facsimile: (818) 609-0892

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 Peter H. Kirwan

Department 19

CLASS ACTION

**DECLARATION OF SAHAG MAJARIAN
IN SUPPORT OF MOTION
FOR AN ORDER GRANTING
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: TO BE ASSIGNED

Time: 9:00 a.m.

Dept: 19

Judge: Hon. Peter H. Kirwan

Complaint filed: February 24, 2020

Trial date: Not set

Declaration of Sahag Majarian II ISO Motion for Preliminary Approval of Class Action
Settlement

Case No. 20CV364033

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 preliminary 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.

Declaration of Sahag Majarian II ISO Motion for Preliminary Approval of Class Action Settlement

Case No. 20CV364033

1 These cases include *Herrera v. Mountain Meadow Mushroom Farms, Inc.*, SDCSC Case No.
2 37-2009-00092416-CU-MT-CTI; *Aguirre v. California Drop Forge, Inc.*, LASC Case No.
3 BC374521; *Marroquin v. Swissport North America, Inc.*, LASC Case No. BC390001; and
4 *Romero v. Hydraulics International, Inc.*, LASC Case No. 19STCV04463.

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

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

15 6. Based on my experience as Class counsel in other employment cases and given
16 the legal and factual realities presented in this case, I believe the proposed settlement is fair,
17 reasonable and adequate for the class members. As a result of my prior experience as class
18 counsel in other class actions, I am fully aware of the responsibilities I would owe as Class
19 counsel in this action.

20 7. Based on my experience in class action litigation, as well as my experience with
21 similar class cases involving similar claims, the settlement amount provides the class of
22 employees with a real and significant benefit. My endorsement of the settlement is without
23 reservation.

24 Executed on November 17, 2022 at Tarzana, California.

25
26 DocuSigned by:
Sahag Majarian
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Sahag Majarian II