

Edwin Aiwazian (SBN 232943)
Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff Anthony Masinas

Kevin T. Barnes (SBN 138477)
LAW OFFICES OF KEVIN T. BARNES
1635 Pontius Avenue, Second Floor
Los Angeles, California 90025
Tel: (323) 549-9100 / Fax: (323) 549-0101

Raphael A. Katri (SBN 221941)
LAW OFFICES OF RAPHAEL A. KATRI
8549 Wilshire Boulevard, Suite 200
Beverly Hills, California 90211
Tel: (310) 940-2034 / Fax: (310) 733-5644

Attorneys for Proposed Plaintiff Juan Partida

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN JOAQUIN

ANTHONY MASINAS, individually, and on
behalf of other members of the general public
similarly situated,

Plaintiff,

vs.

FLEETPRIDE, INC., an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: STK-CV-UOE-2018-0015792

Honorable Jayne Lee
Department 10C

CLASS ACTION

**DECLARATION OF RAPHAEL A. KATRI
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Plaintiffs' Motion for Preliminary Approval of
Class Action Settlement; Declarations of Class
Counsel (Edwin Aiwazian and Kevin T.
Barnes); Declarations of Proposed Class
Representatives (Anthony Masinas and Juan
Partida); and [Proposed] Order filed
concurrently herewith]

Date: August 3, 2021
Time: 9:00 a.m.
Department: 10C

Complaint Filed: December 18, 2018
Trial Date: None Set

1 **DECLARATION OF RAPHAEL A. KATRI IN SUPPORT OF PLAINTIFF'S**
2 **MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA**
3 **SETTLEMENT**

4 I, Raphael A. Katri, declare:

5 1. I am an attorney duly licensed to practice law in the State of California and am
6 the principal attorney at The Law Offices of Raphael A. Katri, Co-Counsel of record for Juan
7 Partida. I have personal knowledge of the matters set forth herein, and would and could testify
8 thereto if called as a witness herein. I make this declaration in support of the adequacy of my
9 representation as Co-Counsel in this matter, and in support of final approval of class action
10 settlement.

11
12 2. I graduated from the University of California at Los Angeles in 1999 with a
13 degree in Sociology. I graduated from Loyola Law School of Los Angeles in 2002. I am
14 currently the principal attorney in The Law Offices of Raphael A. Katri in Los Angeles. I am
15 an attorney duly licensed to practice law in the States of California, Texas and New York, and
16 am a member in good standing with the Bar of this Court.

17
18 3. The majority of my legal experience since becoming a member of the California
19 Bar in 2002 has been devoted to the practice of California and federal employment law. Indeed,
20 my current law practice is devoted almost exclusively to employment law; namely representing
21 plaintiffs in wage and hour and representative claims and actions with the same or similar
22 causes of actions brought forth in the matter pending before this Court.

23
24 4. I have actively participated in the prosecution and successful settlement of
25 multiple wage and hour class action lawsuits and representative actions, helping to recover
26 millions of dollars on behalf of the respective class members and/or aggrieved employees in
27 those cases, Hernandez, et al v. Tyco International (US), Inc., et al. (Case No. BC315749),
28 Enterprise Wage and Overtime Cases, (Consolidated Case No. JCCP 4417), Tejeda, et al. v. La-

1 Z-Boy Inc. (Case No. CIVDS1311851), Pandey v. Sheridan Assisted Living, Inc. (Case No.
2 BC519461), Lukasik v. Design Within Reach, Inc. (Case No. BC528661), Montalvo v. Swift
3 Transportation Corp. (Case No. 37-2011-00094313-CU-OE-CTL), Terrazas v. Avanti Agency
4 Corp. (Case No. RIC1409978), Thomas v. Universal Home Care, Inc. (Case No. BC600623),
5 Vaquero v. Stoneledge Furniture LLC (Case No. BC522676), Sforza v. Go Wireless, Inc. (Case
6 No. BC636573), Jesus Lopez v. InTouch Mobile (Case No. BC619823), Garcia v. General
7 Coatings Corporation (Case No. 37-2016-00041617-CU-OE-CTL), Jose Balbastro v. Premier
8 Insurance Services, Inc. (Case No. 37-2018-00023269-CU-OE-CTL), Loughrie v. Target
9 Corporation (Case No. CIVDS1804580), Bennett v. Alorica, Inc. (Case No. 30-2018-00997257-
10 CU-OE-CXC), Chacon v. Exel, Inc. (Case No. CIVDS1721284), Gonzalez v. CVS Pharmacy,
11 Inc. (Case No. 30-2017-00951164-CU-OE-CXC), Bell v. CEVA Logistics U.S., Inc. (Case No.
12 Case No.: 5:19-cv-00352-SVW (KK)), Salgado v. T-Mobile USA, Inc. (Case No.: 1:17-cv-
13 00339-JLT), Suazo v. Leslie's Poolmart, Inc. (Case No. RIC185126), Woods v. Fresno Valves
14 & Castings, Inc. (Case No.: 16CECG01134), Cahilig v. Ikea U.S. Retail, LLC (Case No.: 2:19-
15 cv-01182), Elayda v. Physassist Scribe, Inc. (Case No.: CIVDS 2002023), DeLeon v. Jones
16 Lang Lasalle Americas, Inc. (Case No. 37-2019-00028271-CU-OE-CTL), Angel Arroyo Mier
17 v. Mainfreight, Inc. (Case No. 19STCV04465).

18
19 5. Although I am experienced in employment, class action matters and
20 representative actions, I associated in as co-counsel on this case Law Offices of Kevin T.
21 Barnes. This firm has a great deal of experience in wage and hour class action employment
22 cases and representative actions, and together both of our firms have and will continue to
23 aggressively and competently represent the named plaintiff and the other aggrieved individuals
24 in this case. In light of the foregoing, I am qualified to act as co-Class Counsel in this matter.

25
26 6. Based upon my experience in handling wage and hour class action cases for
27 nearly twenty years, I believe the settlement is fair, reasonable and in the best interest of the
28 class.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3 Executed June 22, 2021 at Los Angeles, California.

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5 RAPHAEL A. KATRI, Declarant
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