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10 Attorneys for Plaintiff Francisco Schiller, on behalf of himself
and all other aggrieved and similarly-situated employees

11 **SUPERIOR COURT OF CALIFORNIA**

12 **FOR THE COUNTY OF SAN BERNARDINO**

13 FRANCISCO SCHILLER, on behalf of himself
14 and all other aggrieved and similarly-situated
15 employees,

16 Plaintiff,

17 v.

18 ASHLEY DISTRIBUTION SERVICES, LTD.,
19 a Wisconsin Limited Company; and DOES 1
through 10, Inclusive,

20 Defendants.

LEAD CASE NO. CIVDS2013264

Consolidated with Case No. CIVDS2014776

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Jessica Morgan

Department S26

CLASS AND REPRESENTATIVE ACTION

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

Date: November 29, 2023

Time: 8:30 a.m.

Dept: 26

Judge: Hon. Jessica Morgan

Complaint filed: June 16, 2020

Trial Date: Not set

1 I, Sahag Majarian II, declare as follows:

2 1. I am an attorney duly licensed to practice in the State of California. I am the principal of
3 the Law Offices of Sahag Majarian II, and am one of the attorneys of record for Plaintiff Francisco
4 Schiller in this action against Defendant Ashley Distribution Services, Ltd. I have personal knowledge
5 of the following, and if called and sworn as a witness, I could and would competently testify thereto.
6 This declaration is made in support of preliminary approval of the class action settlement in this case.

7 2. I graduated from Loyola Law School in 1990. Since my graduation, I have been in private
8 practice primarily representing consumers against insurance companies and workers against their
9 employers. I have devoted a significant portion of my practice to employment law and class actions,
10 and have been appointed co-class counsel for the plaintiffs in no less than 50 wage and hour class
11 actions. A sample of these cases are: *Ayvazi v. Ralph Grocery Company*, LASC Case No. BC 382980;
12 *Sandoval vs. Chevron Stations, Inc.*, MCSC Case No. CV 061690; *Nieves v. Roy's Worldwide, Inc.*,
13 OCSC Case No. 06CC0076; *Corado v. Good Year Rubber Corp.*, SBSC Case No. RCV095476; *Pleitez*
14 *v. Johnson Controls*, LASC Case No. BC353315; *Serrano v. BCI Coca Cola Bottling Co. of L.A.*, LASC
15 Case No. BC349904; *Urbina v. Valley Crest Co.*, LASC Case No. BC356023; *Moraza v. OK*
16 *International*, OCSC Case No. 06CC0148; *DeLuna v. Target*, LASC Case No. BC353080; *Daglian v.*
17 *Staples, Inc.*, LASC Case No. BC375325; *McCoy v. Kimko*, OCSC Case No. 07CC00007; *Razo v. C &*
18 *D Zodiac, Inc.*, OCSC Case No. 07-CC01373; and *Gomez v. Spenuzza, Inc. et al*, RCSC Case No
19 RIC524075.

20 3. In the employment class action arena, I have participated in over 300 class action
21 mediations. My participation has included extensive preparation, development of thorough knowledge
22 of the legal issues related to certification and liability, and full immersion and participation in the
23 mediation and negotiation process. I have also been designated co-class counsel in various cases where
24 we prevailed in contested class certification motions. These cases include *Herrera v. Mountain Meadow*
25 *Mushroom Farms, Inc.*, SDCSC Case No. 37-2009- 00092416-CU-MT-CTI; *Aguirre v. California*
26 *Drop Forge, Inc.*, LASC Case No. BC374521; and *Marroquin v. Swissport North America, Inc.*, LASC
27 Case No. BC390001.

1 4. My participation in this case has included legal research, extensive preparation,
2 development of a thorough knowledge of the legal issues related to certification and liability as well as
3 strategizing with co-counsel to move the case to mediation. The settlement in this case was reached
4 after extensive negotiations during a full day mediation with the experienced and well-respected
5 mediator Todd Smith, Esq. Based upon the totality of circumstances, I believe that the result achieved
6 in this case is a good outcome for all class members.

7 5. Based on my experience as Class Counsel, and given the legal and factual realities
8 presented in this case, I believe the proposed settlement is fair, reasonable and adequate for the class.
9 As a result of my prior experience as class counsel in other class actions, I am fully aware of the
10 responsibilities I would owe as Class Counsel to the Class in this action.

11 6. Finally, I am not aware of any conflict of interest between myself and Plaintiff or any
12 other Class Member which would interfere with my duties as Class Counsel or impede my
13 representation of the proposed Class.

14 I declare under penalty of perjury under the laws of the State of California that the foregoing is
15 true and correct. Executed on August 3, 2023 in Tarzana, California.

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Sahag Majarian II