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6 Attorneys for Plaintiff EDWARD MORALES TELLEZ,
on behalf of himself and others similarly situated
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SAN BERNARDINO

10 EDWARD MORALES TELLEZ, an
11 individual, on behalf of himself and others
similarly situated,

12 Plaintiff,

13 vs.

14 PICK-YOUR-PART AUTO WRECKAGE, a
15 California corporation; and DOES 1 through
50, inclusive,

16 Defendants.
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Case No.: CIVDS2017040

Hon. David Cohn

**DECLARATION OF ROMAN SHKODNIK
IN SUPPORT OF PLAINTIFFS' MOTION
TO APPROVE PAGA SETTLEMENT**

*[filed concurrently with Plaintiff's Notice of
Motion and Motion; Memorandum of Points and
Authorities; Declaration of David Yeremian;
and [Proposed] Order]*

Date: November 8, 2021

Time: 10:00 a.m.

Dept.: S-26
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2 **DECLARATION OF ROMAN SHKODNIK**

3 I, Roman Shkodnik, declare as follows:

4 1. I am an attorney licensed and admitted to practice before all courts of the State of
5 California and the United States District Courts for the Central, Southern, Eastern and Northern
6 Districts of California. I have personal knowledge of the facts herein, and if called as a witness I
7 could and would competently testify to them.

8 2. I am an associate attorney at David Yeremian & Associates, Inc., and counsel of
9 record for Plaintiff Edward Morales Tellez ("Plaintiff" or "PAGA Representative") on behalf of
10 himself and similarly situated employees of Defendant Pick-Your-Part Auto Wrecking
11 ("Defendant").

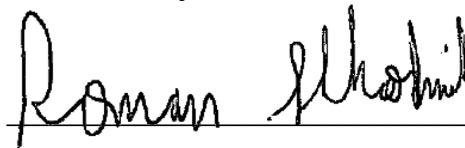
12 3. I received my Bachelor of Arts in history and political science from the University
13 of California, Los Angeles, in 2007. I then earned my Juris Doctorate from Loyola Law School in
14 May of 2011. Upon graduating from law school, I have exclusively focused my practice on
15 representing employees including in wage-and-hour class actions.

16 4. This Declaration is offered in support of Plaintiff's motion for final approval of a
17 settlement agreement negotiated and entered into at arm's length by the parties herein.

18 5. To provide the Court with an overview of the work done by PAGA Counsel in this
19 case, I provide a detailed summary of the hours I have invested in this action as **Exhibit 1**. As
20 detailed in **Exhibit 1**, I have spent approximately 75 hours on this matter.

21 6. I declare under the penalty of perjury under the laws of the State of California that
22 the foregoing is true and correct.

23 Executed this 14th day of October 2021 at Glendale, California.

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26 Roman Shkodnik
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EXHIBIT 1

Tasks Performed	Atty Hours Est.	Date range
<u>1. Initial conferences and correspondence with Defendant's counsel and Initial scheduling conference</u> - Review case initiation documents, conformed copies, and review initial Case Management Conference order and draft notice of CMC - Confer and correspond with process server regarding service on Defendant and status and documents to provide - Conduct multiple conferences with Client and exchange e-mails regarding ongoing experiences as a current employee of Defendant and evidencing claims - Continue compiling case documents from Plaintiff and case research regarding the applicable authorities and claims and Defendant's policies and operations - Conduct teleconferences and exchange correspondence regarding claims and Defendant and its operations and the case and claims - Confer with defense counsel regarding notice and acknowledgement - Draft multiple correspondences to Defense counsel regarding case and conference and appearance and discovery - Conduct further investigation into the claims, and conferences with client regarding same and documents supporting allegations	5	April 2021
<u>2. Potential ADR Discussions and initial informal discovery requests</u> - Confer with defense counsel and exchange e-mails regarding decision to proceed with mediation and status of discovery and how to approach in light of agreement. - Draft and serve initial informal and formal discovery requests and confer and correspond with Defendant's counsel regarding them and responsive information and documents. - Confer and correspond with Defendant and mediators regarding mediator selection and availability and scheduling. - Agree upon mediator and draft multiple e-mails and respond regarding scheduling. - Book mediation and begin preparation after finalizing scheduling based on parties and counsel schedules and availability and that of the mediator. - Confer with Plaintiff regarding mediation and availability, and review multiple correspondences from Plaintiff regarding ongoing claims and issues to address with Defendant. - Draft stipulations and file all documents regarding conferences and case management dates and continuances for mediation. - Confer with statistical analysis expert regarding production and review and information and items needed to provide conclusions and recommendations and provide documents to him; discuss case claims and approach to damages.	10	April 2021 – July 2021
<u>3. Complete Initial Informal Discovery, Mediation Preparation, and</u>	35	July 2021

<u>Conduct Mediation and further discovery meet and confer –</u> • Draft correspondence with Defendant’s counsel and mediator regarding mediation and scheduling. • Complete informal discovery and production of documents and Aggrieved Employees’ data. • Review all production and file documents and policy documents and compile key exhibits and documents for mediation. • Confer and correspond with Defendant’s counsel regarding Aggrieved Employees’ data and numbers agreed upon and extrapolated for mediation. • Complete and draft calculations of Defendant’s potential liability exposure and summarize defenses to each and alleged bases for reduction in calculated numbers. • Provide Aggrieved Employees data and documents as necessary to expert and confer with expert regarding conclusions and numbers for Aggrieved Employees based on the provided information. • Conduct case law review and research regarding accurate wage statements. • Draft mediation brief, address background and procedure and discovery completed, address relevant policies of Defendant and each of Plaintiff’s claims, and the facts and law supporting them, and research and calculate potential estimated damages and penalties exposure. • Complete conferences with defense counsel regarding Settlement and general terms. • Draft correspondence following mediation with mediator and confer regarding continued efforts to finalize settlement terms. Agree to and address general terms for settlement and begin drafting agreement and Aggrieved Employees notice.		
<u>4. Finalizing Settlement Agreement and Terms –</u> • Draft and correspond with Defense counsel regarding Memorandum of Agreement and attend to finalizing and executing. • Draft stipulation to continue case management conference to complete Settlement Agreement and attend to filing. • Draft long form Settlement Agreement and conduct multiple conferences and correspondence with defense counsel regarding detailed terms and revisions. • Multiple correspondence and conferences with defense counsel regarding settlement terms and revisions and additions. • Draft Aggrieved Employees Notice and e-mails regarding same and finalizations after editing. • Confer with administrators and receive quotations and agree on estimate and administrator. • Conduct multiple conferences with Plaintiff regarding Settlement and terms and responding to his questions and concerns. • Finalize Settlement Agreement and attend to execution and confer	10	July 2021 – September 2021

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Detailed Time and Task Summary – Roman Shkodnik

and correspond with Plaintiff regarding same.		
<u>5. Motion for PAGA Settlement Approval:</u> • Draft motion for PAGA approval of the Settlement and supporting documents and declarations and attend to filing. • Conduct multiple conferences and exchange correspondence with defense counsel regarding motion for approval documents and revisions as required.	15	September 2021
TOTAL:	75 Hrs.	