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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

VICTOR FARDANESH, individually, and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act;

Plaintiff,

vs.

HEALTHCARE SERVICES GROUP, INC.,
an unknown business entity; HCSG WEST,
LLC, an unknown business entity; 915
QUALITY BUSINESS SOLUTIONS, INC.,
an unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 20STCV33842

Honorable Maurice A. Leiter
Department 54

**DECLARATION OF VICTOR
FARDANESH IN SUPPORT OF
PLAINTIFF'S MOTION FOR
APPROVAL OF PRIVATE
ATTORNEYS GENERAL ACT (CAL.
LABOR CODE § 2698, *ET SEQ.*)
SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEYS' FEES,
COSTS, SERVICE AWARD, AND
SETTLEMENT ADMINISTRATION
COSTS**

[Notice of Motion and Motion for Approval of
Private Attorneys General Act (Cal. Labor
Code § 2698, *Et Seq.*) Settlement Agreement
and Award of Attorneys' Fees, Costs, Service
Award, and Settlement Administration Costs;
Declaration of Plaintiff's Counsel
(Edwin Aiwazian); and [Proposed] Order and
Judgment filed concurrently herewith]

Date: June 6, 2022
Time: 9:00 a.m.
Department: 54

Complaint Filed: September 3, 2020
Trial Date: None Set

DECLARATION OF VICTOR FARDANESH

I, **Victor Fardanesh**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendants Healthcare Services Group, Inc. and HCSG West, LLC (collectively, "HCSG") in an hourly-paid, non-exempt position from approximately May 2019 to October 2019. I decided to seek legal advice about my work experiences with HCSG and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there, including Edwin Aiwarzian. I wanted to do whatever I could to make sure HCSG was held accountable for not paying its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative wage-and-hour lawsuits on my own and did some research into the leading employment law firms in California for approximately 10 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 9 hours discussing my situation, and representative actions under the Private Attorneys General Act ("PAGA") in general, and what it meant to be a named plaintiff and PAGA representative.

3. I have spent over 19 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which included gathering documents concerning my employment with HCSG, reviewing documents with my attorneys and answering their questions, providing guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from HCSG. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had, and was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible, gave them all the information I had, and identified as many documents as I could. I spent at least 18 additional hours speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information

concerning the case, and also describing the policies, practices, and procedures of HCSG.

5. As far as the settlement is concerned, I was available to review the settlement documents and answer any questions my attorneys had. I spent about 4 hours reviewing the settlement agreement and about 4 hours asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent the aggrieved employees. I think my efforts helped to get the results obtained in this case, and as a PAGA representative, I respectfully request that the Court award me an enhancement payment in the amount of \$9,500.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

7. I am not related to anyone associated with Lawyers *for* Justice, PC.

8. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as a service award, as well as my share of the net settlement fund as an aggrieved employee.

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

Executed on 02/15/2022, at Anaheim, California.

Electronically Signed 2022-02-16 00:13:24 UTC - 174.193.207.103
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Victor Fardanesh