

**MELMED LAW GROUP P.C.**

Jonathan Melmed, CA Bar No. 290218  
jm@melmedlaw.com  
Laura M. Supanich, CA Bar No. 314805  
lms@melmedlaw.com  
1801 Century Park East, Suite 850  
Los Angeles, California 90067  
Telephone: (310) 824-3828  
Facsimile: (310) 862-6851

Attorneys for Plaintiff  
WILLIAM ZELAYA

*[Additional counsel on next page]*

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF ORANGE**

ANDRES ARCOS, individually and on  
behalf of others similarly situated,

Plaintiff,

vs.

AXIOM MATERIALS, INC., a California  
corporation; and DOES 1 through 50,  
inclusive,

Defendants.

Case No.: 30-2020-01144794-CU-OE-CXC  
(Related to: *Steve Valenzuela v. Axiom  
Materials, Inc.*, Case No. 30-2020-01140945-  
CU-OE-CXC; *William Zelaya v. Axiom  
Materials Inc.*, Case No. 30-2020-01155811-  
CU-OE-CXC; and *Andres Arcos v. Axiom  
Materials, Inc.*, Case No. 30-2020-01168863-  
CU-OE-CXC)

**DECLARATION OF JONATHAN  
MELMED IN SUPPORT OF PLAINTIFF'S  
MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT**

1 HEATHER DAVIS, SBN 239372  
2 heather@protectionlawgroup.com  
3 AMIR NAYEBDADASH, SBN 232204  
4 amir@protectionlawgroup.com  
5 CARLOS JIMENEZ, SBN 227534  
6 carlos@protectionlawgroup.com  
7 **PROTECTION LAW GROUP, LLP**  
8 237 California Street  
9 El Segundo, California 90245  
10 Telephone: (424) 290-3095  
11 Facsimile: (866) 264-7880

12 Attorneys for Plaintiff  
13 STEVE VALENZUELA

14 KASHIF HAQUE, SBN 218672  
15 SAMUEL A. WONG, SBN 217104  
16 JESSICA L. CAMPBELL, SBN 280626  
17 FAWN F. BEKAM, SBN 307312  
18 **AEGIS LAW FIRM, PC**  
19 9811 Irvine Center Drive, Suite 100  
20 Irvine, California 92618  
21 Telephone: (949) 379-6250  
22 Facsimile: (949) 379-6251

23 Attorneys for Plaintiff  
24 ANDRES ARCOS

**DECLARATION OF JONATHAN MELMED**

I, Jonathan Melmed declare as follows:

1. I am an attorney licensed to practice law before this Court and the federal and state courts of California. I am over 18 years of age. I have personal knowledge of the facts set forth in this declaration and if called upon to testify, could and would testify competently thereto.

2. I am a founding shareholder in the law firm of Melmed Law Group P.C. who, together with my co-counsel (together, "Class Counsel" or "Plaintiff's Counsel"), serve as attorneys of record for Plaintiff William Zelaya ("Plaintiff" or "Class Representative") and the proposed settlement class (the "Class" or "Class Members") in the above-captioned matter.

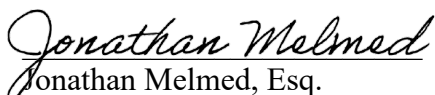
3. Class Counsel has entered into a fee splitting agreement between Protection Law Group, LLP, Aegis Law Firm, PC, and Melmed Law Group P.C., which provides 40% to Protection Law Group, LLP, 40% to Aegis Law Firm, PC, and 20% to Melmed Law Group P.C.

4. The following table summarizes my offices' timekeeper's fees incurred to date:

| Melmed Law Group P.C. Lodestar Summary |            |               |       |             |
|----------------------------------------|------------|---------------|-------|-------------|
| Timekeeper                             | Experience | Rate Per Hour | Hours | Total       |
| Jonathan Melmed                        | 9 years    | \$733.00      | 5.5   | \$4,031.50  |
| Catherine Tran                         | 6 years    | \$508.00      | 13.5  | \$6,858.00  |
| Laura Supanich                         | 5 years    | \$508.00      | 10.8  | \$5,486.40  |
| Krikor Kouyoumdjian                    | 1 year     | \$381.00      | .2    | \$76.20     |
| Lorie Gutierrez (paralegal)            | 7 years    | \$225.00      | 8     | \$1,800.00  |
| Total                                  |            |               | 38    | \$18,252.10 |

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

Executed on January 28, 2023 in Los Angeles, California.

By:   
Jonathan Melmed, Esq.