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Attorneys for Plaintiff CARINA CAMBEROS, and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

(UNLIMITED JURISDICTION)

CARINA CAMBEROS, on behalf of herself
and others similarly situated,

Plaintiff(s),

vs.

GREAT AMERICAN CHICKEN CORP, INC.;
and DOES 1 thru 50, inclusive,

Defendant(s).

Case No.: 21STCV32015

**DECLARATION OF HAIG B.
KAZANDJIAN IN SUPPORT OF JOINT
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Action filed: August 30, 2021

Hearing Date: April 12, 2022

Hearing Time: 9:00 a.m.

Hearing Dept: SSC-6, Hon. Elihu M. Berle

**DECLARATION OF HAIG B. KAZANDJIAN IN SUPPORT OF JOINT MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

I, HAIG B. KAZANDJIAN, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and am the attorney of record for Plaintiff Carina Camberos ("Plaintiff") in her complaint against Defendant Great American Chicken Corp., Inc. ("Defendant"). Plaintiff and Defendant together are referred to herein as the "Parties". I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. From the inception of the case, Plaintiff's counsel have zealously represented the interests of the Class. The settlement was obtained for the benefit of the Class, as opposed to the individual Class Representative.

3. I was retained based upon a contingency fee arrangement wherein Plaintiff's counsel agreed to advance all costs and receive no fee unless a recovery was accomplished. Specifically, had Plaintiff failed to prevail in this case, counsel for Plaintiff would have spent a significant amount of time, money and other resources without any benefit or return. In addition, had Plaintiff also failed to prevail in the present case, Defendant would have been able to seek attorney's fees and costs in connection with their defense of the case.

4. The Parties engaged in informal discovery, with the production of documents and payroll information. After taking into account sharply disputed factual and legal issues involved in this litigation, the risks attending further prosecution, and the substantial benefits to be received pursuant to the compromise and settlement of the litigation, I have concluded that Settlement is fair, adequate, reasonable, and in the best interests of Plaintiff and the Class.

5. Plaintiff's counsel have extensive litigation experience in class and representative wage and hour actions.

6. My qualifications are as follows: In December 2011, I obtained a license to practice law from the California State Bar. From approximately January 2012 to the present, I have been the founder of Law Offices of Haig B. Kazandjian. Since 2017, I have been the founder and principal attorney at Haig B. Kazandjian Lawyers APC. My practice focuses on complex

1 cases involving labor and employment, as well as mass tort claims. Currently I am the attorney
2 of record in several employment-related wage and hour putative class actions and PAGA
3 representative actions. I am well-experienced in wage-and-hour class action litigation as well as
4 PAGA litigation and have gained Final Approval of many wage-and-hour class action cases and
5 PAGA only cases. By way of example, I have acted as lead counsel on the following class and
6 PAGA sample cases which gained Final Approval by the Court: (a) Kalbaklian et al. v. PSI
7 Services LLC (BC637011 – Judge Freeman); (b) Hackett et al. v. Hotei Marketing (BC639589 –
8 Judge Palazeulos); and (c) Shamiryan et al. v. Codemetro (BC683326 – Judge Buckley) (d)
9 Gutierrez et al. v. Foremost Foods Corp. (BC706453 – Judge Mooney); (e) Salinas et al. v. True
10 World Foods Los Angeles (18STCV01288– Judge Nelson); (f) Estrada v. TT Fremont Holding,
11 Inc. (19CHCV00193 – Judge Sandvig); (g) Visket v. LA Solar Group Inc (LS030122 – Judge
12 Cotton); and (g) Nicholas v. Rockstar Beverage Corp. (19STCV18234 – Judge Court).

13 I declare under the penalty of perjury of the laws of the State of California that the
14 foregoing is true and correct to the best of my knowledge.

15 Executed on Monday, March 7, 2022 at Glendale, California.

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18 Naig B. Kazandjian;
19 Declarant
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