

DAVID YEREMIAN & ASSOCIATES, INC.
David Yeremian (SBN 226337)
david@yeremianlaw.com
Natalie Haritonian (SBN 324318)
natalie@yeremianlaw.com
2540 Foothill Blvd., Suite 201
La Crescenta, CA 91214
Telephone: (818) 230-8380
Facsimile: (818) 230-0308

LAW OFFICES OF SAHAG MAJARIAN II
Sahag Majarian II (SBN 146621)
sahagii@aol.com
18250 Ventura Blvd.
Tarzana, CA 91356
Telephone: (818) 609-0807

Attorneys for Plaintiff MARIA CASTILLO-RODRIGUEZ,
on behalf of herself and others similarly situated

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

MARIA CASTILLO-RODRIGUEZ, an
individual on behalf of herself and all others
similarly situated,

Plaintiff,

vs.

HR OUTSOURCING ASSOCIATES, LLC, a
Delaware limited liability company;
CALIFORNIA DISTRIBUTION CENTER, a
business entity of unknown

Defendants.

Case No.: 20STCV44138

REPRESENTATIVE ACTION

Assigned for All Purposes To:
Hon. Robert Broadbelt
Dept.: 53

**DECLARATION OF SAHAG MAJARIAN
II IN SUPPORT OF JOINT STIPULATION
RE PAGA PENALTY SETTLEMENT**

DECLARATION OF SAHAG MAJARIAN II

I, Sahag Majarian II, declare:

1. I am an attorney duly licensed to practice in the State of California and am the principal of the Law Offices of Sahag Majarian II, one of the attorneys of record for Plaintiff Maria Castillo-Rodriguez in this action against Defendant. I have personal knowledge of the following, and if called and sworn as a witness, I could and would competently testify thereto. This declaration is made in support of the Joint Stipulation Re PAGA Penalty Settlement.

2. I graduated from Loyola Law School in 1990. Since my graduation, I have been in private practice primarily representing consumers against insurance companies and workers against their employers. I have devoted a significant portion of my practice to employment law and class actions, and have been appointed co-class counsel for the plaintiffs in no less than 200 wage and hour class actions. A sample of these cases are: *Ayvazi v. Ralph Grocery Company*, LASC Case No. BC 382980; *Sandoval v. Chevron Stations, Inc.*, MCSC Case No. CV 061690; *Nieves v. Roy's Worldwide, Inc.*, OCSC Case No. 06CC0076; *Corado Good Year Rubber Corp.*, SBSC Case No. RCV095476; *Pleitz v. Johnson Controls*, LASC Case No. BC353315; *Serrano v. BCI Coca Cola Bottling Co. of LA*, LASC Case No. BC349904; *Urbina v. Valley Crest Co.*, LASC Case No. BC356023; *Moraza v. OK International*, OCSC Case No. 06CC0148; *DeLuna v. Target*, LASC Case No. BC353080; *Daglian v. Staples, Inc.*, LASC Case No. BC375325; *McCoy v. Kimko*, OCSC Case No. 07CC00007; *Razo v. C & D Zodiac, Inc.*, OCSC Case No. 07-CC-01373; and *Gomez v. Spenuzza, Inc. et al.*, RCSC Case No. RIC524075.

3. In the employment class action arena, I have participated in over 300 class and PAGA action mediations. My participation has included extensive preparation, development of thorough knowledge of the legal issues related to certification and liability, and full immersion and participation in the mediation and negotiation process. I have also been designated co-class counsel in various cases where we prevailed in

1 contested class certification motions. The cases include: *Herrera v. Mountain Meadow*
2 *Mushroom Farms, Inc.*, SDCSC Case No. 37-2009-00092416-CU-MT-CTI; *Aguirre v.*
3 *California Drop Forge, Inc.*, LASC Case No. BC374521; and *Marroquin v. Swissport*
4 *North America, Inc.*, LASC Case No. BC390001; *Ruiz v. JCP Logistics, Inc.*, USDC
5 Central District Case No. 8:13-cv01908-JLS-AN; and *Hernandez v. Osgood Incorporated,*
6 *et. al.*, LASC Case No. 19TCV43133..

7 4. Throughout my thirty-two-year career in law, my practice has been
8 exclusively contingent fee work. Within the class action arena, I have been designated co-
9 class counsel in no less than 30 class actions that have settled for over \$1 million each.
10 Given my success and experience, in my contingent fee practice I have averaged over
11 \$750 per hour worked. Therefore, I believe it appropriate to set my lodestar at no less than
12 \$750 per hour in this case. This request is fair in view of the much higher rate per hour
13 that can be justified by the broadly accepted Laffey Matrix which shows hourly rate of
14 \$919 for attorneys out of law school for more than 20 years.

15 5. My involvement in this case has included analysis and research relative to
16 Labor Code violations as to the employment practices of Defendant. In the process, I
17 developed a thorough knowledge of the legal issues related to liability and manageability.
18 In addition, I was involved in evaluating the records, policies and practices of Defendant
19 and formulating an exposure analysis for the violations asserted against it. The settlement
20 in this case was reached after a full day mediation with an experienced and well respected
21 mediator Gail Glick. Based upon the totality of the circumstances, I believe that the result
22 achieved in this case is an extremely good outcome for the aggrieved employees as well as
23 the State of California.

24 6. Based on my experience as PAGA counsel in other employment cases and
25 given the legal and factual realities presented in this case, I believe the proposed
26 settlement is fair, reasonable and adequate for the employees. As a result of my prior
27 experience as class counsel and plaintiff's counsel in employment PAGA actions, I am
28

1 fully aware of the responsibilities I owe as PAGA Counsel to the aggrieved employees in
2 this action.

3 7. I was approached by Plaintiff Maria Castillo-Rodriguez in April of 2020 in
4 connection with potential employment law claims she believed she may have had against
5 Defendant. After conducting an investigation of the facts and data, my co-counsel David
6 Yeremian of David Yeremian & Associates, Inc. and I proceeded with the filing of a
7 PAGA action against Defendant. Subsequent to the filing of the case, we proceeded to
8 mediation with exchange of informal discovery leading to the resolution upon which the
9 PAGA approval is being sought in this action.

10 8. Throughout the past twenty six months, I have been involved in the
11 handling of this matter. My work on this case includes but is not limited to pre-litigation
12 research and investigation regarding the Defendant, communication with client and co-
13 counsel, legal research, investigation of witnesses, analysis of employment records as well
14 as policies and procedures of Defendant and preparation of exposure model of damages.

15 9. My law office, along with David Yeremian & Associates, Inc. undertook
16 this matter on a purely contingent basis with no guarantee that the time expended would
17 result in any recovery or recoupment of costs. Throughout my 26 months of involvement
18 in this matter, I have spent a total of 15.40 hours in this case. Based upon my rate of \$750
19 per hour approved by various Superior Courts in California, my unadjusted lodestar
20 amount would be for \$11,550. I have incurred minimal costs in this case for overnight
21 mail, postage, and copying. My office waives the recovery of said costs.

22 10. Based on my experience in PAGA litigation in general, as well as my
23 experience with PAGA cases involving similar claims and violations, the settlement and
24 amount being made available provides the Class and beneficiaries of the PAGA settlement
25 with a real and significant benefit. My endorsement of the Settlement is without
26 reservation.

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

3 Dated: December 20, 2022

DocuSigned by:
Sahag Majarian
3142D9828E6E4A2...

4 Sahag Majarian II