

KINGSLEY & KINGSLEY, APC

ERIC B. KINGSLEY, Esq., Cal. Bar No. 185123
eric@kingsleykingsley.com
LIANE KATZENSTEIN LY, Esq., Cal. Bar No. 259230
liane@kingsleykingsley.com
JESSICA L. ADLOUNI, Esq., Cal. Bar No. 328571
jessica@kingsleykingsley.com
16133 Ventura Blvd., Suite 1200
Encino, CA 91436
Telephone: (818) 990-8300
Fax: (818) 990-2903

DADGOSTAR LAW, LLP

Hirad D. Dadgostar, Cal. Bar No. 241549
hirad@dadgostarlaw.com
Azadeh Dadgostar Gilbert, Cal. Bar No. 276072
azadeh@dadgostarlaw.com
12400 Wilshire Blvd., Suite 400
Los Angeles, CA 90025-1030
Tel: (310) 820-1022
Facsimile: (310) 820-1088

Attorneys for Plaintiff Shane Caskey

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – COMPLEX DIVISION**

SHANE CASKEY; KALKIDAN SILER, as
individuals, on behalf of themselves and others
similarly situated,

Plaintiffs,

v.

Defendant(s) JOEY RESTAURANT
(LOS ANGELES) INC.; JOEY RESTAURANT
(MANHATTAN BEACH) INC.; JOEY
RESTAURANT (WOODLAND HILLS) INC.;
JOEY RESTAURANT GROUP; and DOES 1
thru 50, inclusive,

Case No.: 21STCV11098

[Case Assigned for All Purposes to Hon. David
Cunningham in Dept. 11]

**DECLARATION OF HIRAD D.
DADGOSTAR IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL**

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1. The facts set forth in this Declaration are true and of my own personal knowledge, and I have first hand knowledge of them. If called as a witness, I could and would testify competently under oath to the facts set forth herein.

3. I provide here a summary of my background and legal experience. I graduated from University of California, Los Angeles in 2000 with a B.A. degree in Business-Economics. I graduated from UCLA School of Law in 2005. Immediately thereafter, I passed the California bar and have been admitted to practice law in the State of California since January 2006. Before practicing law, I served for two years as a federal judicial law clerk to the late Honorable Robert C. Broomfield at the United States District Court for the District of Arizona. After my clerkship, I practiced as a litigation associate with Jones Day, where I practiced focused on commercial litigation with an emphasis on matters involving contract disputes, business torts, consumer class actions, credit reporting, and competition law.

5. My law partner, Azadeh Dadgostar Gilbert, obtained her undergraduate degree from University of California at Los Angeles, and her Juris Doctor degree from Pepperdine Caruso School of Law. Prior to founding Dadgostar Law LLP with me, she previously served as

1 federal judicial extern to the late Honorable Earl H. Carroll, United States District Judge for the
2 District of Arizona and as an intern with the international law firm WilmerHale.

3 6. Since establishing Dadgostar Law LLP in 2011, Ms. Gilbert and I have both received
4 recognition in multiple years as Super Lawyers Rising Stars, among our other professional
5 accolades. In 2020, Ms. Gilbert completed her service as the President of the Iranian American
6 Lawyers Association, a position in which I had previously served from 2015-16. In 2016, we
7 and our firm, Dadgostar Law LLP, as well as other co-counsel, were recognized for having
8 obtained one of the year's top 50 settlements in California for our work as class counsel on
9 behalf of CVS pharmacists. See <https://topverdict.com/lists/2016/california/50-settlements> (last
10 visited Dec. 3, 2020).

11 7. Since establishing our firm almost ten years ago, Ms. Gilbert and I have been appointed
12 as class counsel in over a dozen class action matters, including *Alessandro Memari v. Barone's*
13 *Inc. dba Barone's Famous Italian Restaurant, et al.*, Los Angeles County Superior Court Case
14 No. 19STCV16547 (filed May 13, 2019); *Ian H. Stark v. CVS Pharmacy, Inc., et al.*, Los
15 Angeles County Superior Court Case No. BC476431 (filed Jan. 5, 2012); *Walid Ibrahim v. CVS*
16 *Pharmacy, Inc., et al.*, Los Angeles County Superior Court Case No. BC489738 (filed Aug. 7,
17 2012); *Hashem Heiati and Anthony Carballo v. CVS Pharmacy, Inc., et al.*, Los Angeles
18 County Superior Court Case No. BC501118 (filed Oct. 19, 2012 in San Diego County Superior
19 Court); *Sandra Schwartz v. CVS Pharmacy, Inc., et al.*, Los Angeles County Superior Court
20 Case No. BC502723 (filed Dec. 14, 2012 in Alameda County Superior Court); *Elizabeth Woods*
21 *and Arash Akmal v. CVS Pharmacy, Inc., et al.*, Los Angeles County Superior Court Case No.
22 BC526977 (filed Nov. 8, 2013); *Yvonne Costello v. CVS Pharmacy, Inc., et al.*, Placer County
23 Superior Court Case No. S-CV-0034850 (filed June 26, 2014); *Rimanpreet Uppal v. CVS*
24 *Pharmacy, Inc., et al.*, U.S. District Court, Northern District of California Case No. 14-CV-
25 02629-VC(VC) (filed Mar. 27, 2014 in Alameda County Superior Court, Case No.
26 RG14719252); *Timothy J. Connell v. CVS Pharmacy, Inc., et al.*, Los Angeles County Superior
27 Court Case No. BC523172 (filed Oct. 2, 2013); *Klara Paksy v. CVS Pharmacy, Inc., et al.*, Los
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1 Angeles County Superior Court Case No. BC523491 (filed Oct. 4, 2013); *Dale Bystrom v. CVS*
2 *Pharmacy, Inc., et al.*, Los Angeles County Superior Court Case No. BC525991 (filed Oct. 29,
3 2013); *Angil Sharobiem, et al. v. CVS Pharmacy, Inc., et al.*, United States District Court (C.D.
4 Cal.) Case No. 2:13-CV-9426-GHK (FFMx); and *Amir Esmaili v. E-Z-Rent-a-Car Inc., et al.*,
5 Los Angeles County Superior Court Case No. BC512717.

6 8. Over the past twenty-seven months, my office and my co-counsel have invested
7 substantial time and resources identifying and investigating potential claims in the action. The
8 work includes time spent interviewing Plaintiffs, particularly concerning Defendants'
9 employment practices, analyzing documents provided by the Plaintiff, reviewing discovery
10 produced by Defendant and reviewing and analyzing publicly available information concerning
11 Defendant. As a result of this work, we have developed a strong, effective working relationship
12 with the Named Plaintiff. My office is prepared to continue to commit substantial resources to
13 representing this class.

14 9. In light of the impending increase for experienced lawyers in specialized practice, I
15 believe that the hourly rates charged by my firm are fair and reasonable and are comparable to
16 or less than those which are charged by my colleagues in California and the national market for
17 prosecuting or defending class actions. I graduated in 2005, passed the July 2005 California
18 Bar Exam, and have been practicing since 2007, following my two-year federal judicial
19 clerkship to the late Hon. Robert C. Broomfield at the United States District Court for the
20 District of Arizona. My billing rate is \$750 per hour.

21 10. I have spent thirty-five (35) hours of work on this matter and expect to spend an
22 additional five (5) hours of work to prepare for and attend the Final Approval Hearing, to direct
23 and oversee the administration of the Settlement, and to resolve any disputes that may arise, for
24 a total of thirty (40) hours of work at \$750.00 an hour for what would be a total of \$30,000.00.

25 11. Class Counsel has spent a significant amount of hours extensively investigating,
26 researching, and litigating this matter, including but not limited to interviewing Plaintiff and
27 flushing out facts and issues, researching the employer and related causes of action, fact
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1 development and investigating Defendant's ownership structure, researching and analyzing
2 relevant claims under B&P § 17200, investigation and discussion regarding job functions,
3 duties, compensation, policies and procedures, *etc.*, regularly meeting and/or communicating
4 with the Class Representative and co-counsel, reviewing documents, appearing for hearing,
5 discussing issues related to damage model calculations, and reviewing and drafting documents
6 for Preliminary and Final Approval.

7 12. Although Class Counsel request that the Court award attorneys' fees based on the
8 common fund method theory, if the Court were to use a lodestar multiplier analysis, Class
9 Counsel's total attorneys' fee request for all firms involved is reasonable. Under either the
10 common fund or lodestar/multiplier analysis, Class Counsel's request for attorneys' fees is
11 reasonable under California law based on the amount of work in this case.

12 All matters contained herein are within my personal knowledge and belief, and, if called
13 and sworn, I can and will testify competently thereto. I was not promised any benefit nor
14 induced to provide this declaration in any way.

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

17 Executed on August 17, 2023 at Marina del Rey, California.
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20 /s/ Hiram D. Dadgostar

21 Hiram D. Dadgostar
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(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On August 31, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF HIRAD D. DADGOSTAR IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

CAMILO ECHAVARRIA
camiloechavarria@dwt.com
EVELYN WANG
evelynwang@dwt.com
CHRISTOPHER IM
christopherhim@dwt.com
DAVIS WRIGHT TREMAINE LLP
865 South Figueroa Street, 24th Floor
Los Angeles, California 90017-2566

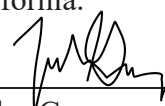
TINA MEHR
tmehr@visionlegalinc.com
VISION LEGAL, INC.
445 S. Figueroa Street, 31st Floor
Los Angeles, California 90071
Attorneys for Defendants
Attorneys for Plaintiff KALKIDAN SILER

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL THROUGH CASE ANYWHERE): On interested parties set forth on the attached service list.

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on August 31, 2023, at Los Angeles, California.



Taylor Gregg