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7 all others similarly situated

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ALBERTO MEZA SOLIS, on behalf of himself and
13 all others similarly situated

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15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

16 **FOR THE COUNTY OF ORANGE**

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18 FAUSTINO RAMOS and ALBERTO MEZA) CASE NO.: 30-2020-01174518-CU-OE-
SOLIS, as individuals and on behalf of all others) CXC
19 similarly situated,)

20 Plaintiffs,) [Assigned for all purposes to the Hon. Peter
J. Wilson - Dept. "CX-101"]

21 v.)
22) **DECLARATION OF JAMES A. DE**
HYATT DIE CAST AND ENGINEERING) **SARIO IN SUPPORT OF MOTION**
CORPORATION-SOUTH, a California corporation;) **FOR PRELIMINARY APPROVAL**

23 PARTNERS PERSONNEL - MANAGEMENT) DATE: August 24, 2023
SERVICES, LLC, a Delaware limited liability) TIME: 2:00 p.m.
24 company; NEXEM PARTNERS, LLC, a Delaware) DEPT.: CX-101
limited liability company; and DOES 1 through 100,)

25 Inclusive)

26)
27 Defendants.)

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1 settlement, it was agreed that a First Amended Complaint would be filed in the *Ramos* Action
2 which added Plaintiff Solis, as a class representative, as well as any distinct factual allegations.
3 After the First Amended Complaint is filed in the *Ramos* Action, the *Solis* Action would be
4 dismissed without prejudice.

5 6. On March 27, 2023, a First Amended Complaint was filed in the *Ramos* Action
6 which added Plaintiff Solis as a named representative.

7 **Class Counsel Are Experienced Class Litigators**

8 7. I graduated from UCI with a B.A. in Political Science in 1998. Thereafter I
9 attended University of West Los Angeles School of Law and graduated in 2006. I became a
10 member of the California State Bar in March 2009. In February 2009 I became an associate at
11 Kokozyan & Nourmand LLP and thereafter in June 2010, I became a senior associate at The
12 Nourmand Law Firm, APC. I exclusively represent employees in the area of employment law,
13 wage and hour litigation on an individual and class wide basis. I am admitted to practice in all
14 state courts in California, the United States District Courts of California - Central District, and
15 Ninth Circuit Court of Appeal. I am also an active member of the California Employment
16 Lawyer's Association ("CELA"). I was named as a Rising Star by Super Lawyers and recently
17 selected as a Super Lawyer by Super Lawyers.

18 8. Michael Nourmand, is the principal of The Nourmand Law Firm, APC, and
19 graduated from UCLA with a B.A. in Political Science (Cum Laude) in 1994. Thereafter Mr.
20 Nourmand attended Loyola Law school and graduated in May of 1998. Mr. Nourmand became a
21 member of the California State Bar in December 1998. In September 1999, Mr. Nourmand along
22 with his former business partner Bruce Kokozyan, started the law firm of Kokozyan & Nourmand
23 LLP and began to represent plaintiffs in the area of personal injury, insurance bad-faith,
24 employment law, wage and hour, and class actions. In June 2010, Mr. Nourmand dissolved his
25 partnership at Kokozyan & Nourmand LLP and started The Nourmand Law Firm, APC exclusively
26 representing plaintiffs in the areas of employment law, wage and hour, and class actions. Prior to
27 starting his law firm, Mr. Nourmand worked for a plaintiff's law firm, Rose, Klein & Marias, Law
28 Offices of Gary Bostwick and externed at the U.S. Attorney's Office, Civil Fraud Division and

1 U.S. Bankruptcy Court, Honorable Judge Barry Russell. Mr. Nourmand is admitted to practice in
2 all state courts in California, the United States District Courts of California - Central District,
3 Southern District, Ninth Circuit Court of Appeal, and the United States Supreme Court. In July
4 2011 Mr. Nourmand was selected as one of 75 Top Labor & Employment Lawyers in California by
5 the Daily Journal; in 2011 and 2012 Mr. Nourmand was selected as a Rising Star by Super
6 Lawyers and in 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, and in 2022 he was
7 selected as a Super Lawyer by Super Lawyers. Mr. Nourmand was selected for inclusion in The
8 Best Lawyers in America for 2016, 2017, 2018, 2019, 2020, 2021, and 2022. Mr. Nourmand is
9 also an active member of the California Employment Lawyer's Association ("CELA"), National
10 Employment Lawyer's Association ("NELA"), Consumer Attorneys Association of Los Angeles
11 ("CAALA"), Consumer Attorneys of California ("CAOC"), California State Bar, Labor and
12 Employment Section, and the Los Angeles County Bar.

13 9. Class Counsel are respected members of the California Bar with strong records of
14 vigorous and effective advocacy of their clients, and they are experienced in handling complex
15 class action litigation.

16 10. Class Counsel are experienced in wage and hour class action litigation. The
17 Nourmand Law Firm, APC is currently acting as lead counsel in numerous other wage and hour
18 class actions. Class Counsel have been appointed class counsel on several wage and hour and
19 FACTA class actions. Thus, Class Counsel is sufficiently experienced and qualified to evaluate
20 the Class Members' claims and viability of Defendants' defenses.

21
22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct this 15th day of June 2023, at Beverly Hills, California.
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26 
27 James A. De Sario
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