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Attorneys for Plaintiff and the proposed lass

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KERN

DANIEL STEPHENSON, an individual, on
behalf of himself and others similarly situated

PLAINTIFF,

v.

BAKERSFIELD DODGE, INC.; and DOES 1
thru 50, inclusive,

DEFENDANTS.

CASE NO. BCV-20-102693

[Case Assigned for All Purposes to Hon.
Thomas S. Clark in Dept. 17]

**DECLARATION OF EMIL DAVTYAN IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: May 26, 2023

Time: 8:30 AM

Dept: 17

Complaint Filed: November 18, 2020

FAC Filed: February 18, 2021

Trial Date: None Set

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I, Emil Davtyan, state and declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and am a member in good standing with the State Bar of California. I am co-counsel in the class action representing named Plaintiff DANIEL STEPHENSON and have personal knowledge of the facts thereto. If called as a witness, I could and would competently testify herein.

2. I graduated from the Woodbury University in 2008 with a bachelor's degree in Business Finance with highest honors, as the top student in my class. I graduated from Southwestern Law School in 2014 in the top 10% of my class. I am currently the managing attorney at Davtyan Law Firm in Glendale, California.

3. My legal experience since becoming a member of the California State Bar has been exclusively devoted to the practice of California and federal employment law. My office almost exclusively represents plaintiffs in wage and hour actions with the same or similar causes of actions brought forth in the matter pending before this Court.

4. I have been actively participating in the prosecution and successful settlement of multiple wage and hour class action lawsuits, helping to recover wages and penalties on behalf of tens of thousands of class members.

5. My office has been appointed as Class/PAGA Counsel in numerous class/PAGA actions, including *De La Rosa v. The Coca Cola Company et al.* (Superior Court of California in Napa, 17CV000787), *Harvey v. Bed Bath & Beyond of California Limited Liability Company* (Superior Court of California in Alameda, RG17885153), *Paredes v. Bottling Group LLC et. al.* (Superior Court of California in Kern), *Ramirez v. Harris Ranch Beef Company* (Superior Court of California in Fresno, 16CECG04103), *Gates v. Gate Gourmet, Inc. et. al.* (Southern District of California, 16-cv-01084-L-AGS), *Hargrave v. Antelope Valley Hospital* (Superior Court of California in Los Angeles, BC663252), *Ramirez v. Milton Roy et. al.* (Superior Court of California in Los Angeles, BC 632 276), *Hawkins v. AvalonBay Communities* (Superior Court of California in Santa Clara, 17CV316492), *Jones Tharpe et al. v. Sprint Corporation et al.* (Superior Court of California in Los Angeles, BC644645), *Ortega et al. v. Nestle Waters North America, Inc. et al.*

(Superior Court of California in Los Angeles, BC623610), Schultz v. Jimbo's Natural Family, Inc. (Superior Court of California in San Diego, 37-2017-00022348-CUE-OE-CTL), Ambrose v. Victor Valley Global et al. (Superior Court of California in San Bernardino, CIVDS1709289), Puerta-Gildardo v. Real Time Staffing Services LLC et. al. (Superior Court of California in Los Angeles, BC565445), Vargo v. Pregis Innovative Packaging LLC (Superior Court of California in Tulare, 270836), Conlin v. Aegis Senior Communities LLC (Northern District of California, 17-cv-05534-LHK), Galarza v. Kloeckner Metals Corporation (Central District of California, 2:17-cv-04910-FMO), Estes v. L3 Technologies, Inc. et al. (Southern District of California, 3:17-cv-02356-H-JMA), Rowser v. Trunk Club, Inc. (Central District of California, 2:17-cv-05064-DSF-RAO), Leach v. The Claremont Colleges, Inc. (Superior Court of California in Los Angeles, BC686451), Vaesau v. PCT Enterprises, Inc. dba Precision Cabinets (Superior Court of California, County of Contra Costa MSC18-02404), Terry v. TF Louderback, Inc. dba Bay Area Beverage Company (Superior Court of the State of California, County of Contra Costa, MSC18-00859), Roach v. Westcare California, Inc. (Superior Court of California in Kern County, BCV-17-102367-SDS), Patton v. Church & Dwight Co., Inc. (Central District of California, EDCV 18-903-MWF (KKx)), Juarez v. ISL Employees, Inc. (Superior Court of California in Madera, MCV074787), Ferraro v. USC Verdugo Hill s Hospital, et al. (Superior Court of California in Los Angeles, 18STCV09463), Ford v. Account Control Technology, Inc., et al. (Superior Court of California in Los Angeles, 19STCV09369), Ornelas v. iStorage, et al. (Superior Court of California in San Francisco, CGC-18-571421), Martinez v. Ronpak, Inc. (Superior Court of California in Riverside, RIC1901307), Barrera et al. v. Exclusive Wireless, Inc. (Superior Court of California in Stanislaus, 9000687), Barajas v. Mancha Development Company LLC (Superior Court of California in Orange County, 30-2018-00974707-CU-OE-CXC), Prado v. IMAX Corporation dba IMAC Worldwide Home (Superior Court of California in San Bernardino, CIVDS1820265), Rodriguez v. ND Industries, Inc. (Superior Court of California in Los Angeles, 19STCV38096), Singletary v. Motel 6 Operating LP, et al. (Southern District of California, 3:20-cv-0270-LAB-AHG), Quizon v. CF Watsonville East, LLC, et al. (Superior Court of California in Santa Cruz, 20CV01868), Bacerra v. Hugo Boss Retail, Inc. (Superior Court of California in San

1 Diego, 37-2021-00002933-CU-OE-CTL), Walker v. Ariat International, Inc. (Superior Court of
2 California in Alameda, HG19026439), Orr v. Petvet Care Centers (California) Inc. (Superior Court
3 of California in Santa Clara, 19CV354063), Jimenez v. OEC Distribution Services, Inc. (Superior
4 Court of California in San Bernardino, CIVDS1915743), Virdi v. Absolute Security International
5 (Superior Court of California in San Bernardino, CIVDS 1909589), Raj v. First Transit, Inc
6 (Superior Court of California in Sacramento, 34-2021-00295895-CU-OE-GDS), Marchbanks v.
7 Torrid Administration, Inc. (Superior Court of California in San Diego, 37-2020-00008179-CU-
8 OE-NC), among others.

9 6. My office has been counsel of record in a number of pending wage and hour
10 class/PAGA action lawsuits, including Trevino v. Golden State FC LLC et al. (Eastern District of
11 California, 1:18-cv-00120-DAD (BAM)), Moriana v. Viking River Cruises (Superior Court of
12 California in Los Angeles, BC 687325), Garcia v. Statewide Traffic Safety and Signs, Inc.
13 (Superior Court of California in Orange County, 30-2018-01011814-CU-OE-CXC), Arellano v.
14 Lopez & Arteaga, Inc. et al. (Superior Court of California in Santa Clara, 17CV313029),
15 Cummings v. Eureka Restaurant Group LLC (Superior Court of California in Santa Barbara,
16 18CV000849), Cruz v. Talentscale LLC (Superior Court of California in Riverside County,
17 RIC1821842), Tolbert v. Northbay Healthcare Corporation (Superior Court of California in Solano
18 County, FCS051565), Cruz v. Dignity Health dba Bruceville Terrace (Superior Court of California
19 in Sacramento County, 34-2018-00245506), Limon v. Circle K Stores, Inc. (Eastern District of
20 California, 18-cv-01689-LJO-SKO), Parra, et al. vs. Trinity Services Group, Inc. (Superior Court
21 of California in Kern, JCCP5155), Hernandez v. Clark Pacific (Superior Court of California in
22 Yolo, CV-2019-644), Gomez v. The Regents of the University of California et al. (Superior Court
23 of California in San Diego, 37-2019-00030873-CU-OE-CTL), Larson v. Mark Twain Medical
24 Center (Superior Court of California in Calaveras, 19CV44062) Girard v. Office Depot Inc.,
25 (Superior Court of California in Santa Clara, 19CV351584), Johnson v. Bakersfield Memorial
26 Hospital, et al. (Superior Court of California in Kern BCV-19-102016), Higginbotham et al. v.
27 South East Employee Leasing Services (Eastern District of California, 2:20-CV-00575-KJM-DB)
28 Bailon v. LAFC Sports LLC (Superior Court of California in Los Angeles, 19STCV29518),

1 Hutchinson v. G6 Hospitality LLC dba Motel 6 (Southern District of California, 3:20-cv-00270-
2 LAB-AHG), Powell v. St. Joseph Medical Center (Superior Court of California in San Joaquin,
3 STK-CV-UOE-2019-0011155), Jones v. Summit Therapeutics Services Inc. (Superior Court of
4 California in Santa Clara, 19CV353991), Barksdale v. UC Davis Medical Center (Superior Court
5 of California in Sacramento, 00269829), Springstead v. Recovery Innovations Inc., et al. (Superior
6 Court of California in San Diego, 37-2020-00001555-CU-OE-CTL), Oceana v. Tri-City Medical
7 Center (Superior Court of California in San Diego, 37-2019-65323-CU-OE-CTL), Maldonado v.
8 Sit 'N Sleep, Inc. (Superior Court of California in Los Angeles, 19STCV41237), Taylor v. Populus
9 Group, LLC (Southern District of California, 3:20-cv-00473-BAS-BLM), Lim v. Seafood City, et
10 al. (Superior Court of California in Alameda, RG20066777), Harisis v. Starbucks Corporation
11 (Superior Court of California in Los Angeles, 20STCV11290), Battle v. Safran Cabin (Superior
12 Court of California in Orange, 30-2020-01140831-CU-OE-CXC), Smith v. Noia Residential
13 Services, Inc. (Superior Court of California in Fresno, 20CECG01820), Diaz v. Recon 360, LLC
14 (Superior Court of California in Santa Clara, 20CV370603), Rivas v. 8x8, Inc. (Superior Court of
15 California in Santa Clara, 20cv374192), Compton v. Broadbase, Inc. (Superior Court of California
16 in Sacramento, 34-2020-00285501-CU-OE-GDS), Marden v. CVS Pharmacy, Inc., et al. (Superior
17 Court of California in Placer, S-CV-0045902), Godwin v. St. Mary Medical Center Foundation, et
18 al. (Superior Court of California in Los Angeles, 20STCV45671), Tabera v. St. Elizabeth
19 Community Hospital, et al. (Superior Court of California in San Francisco, CGC-21-589691),
20 Morgan v. Candid Care Co. (Superior Court of California in San Francisco, 3:21-cv-01748-JSC),
21 Richardson v. Pegasus Aviation Services, LLC (Superior Court of California in San Mateo, 21-
22 CIV-00292), Newsome v. Graybar Electric Company, Inc. (Northern District of California,
23 4:21cv1000), Terronez v. ST. JOHN'S Regional Medical Center, et. al. (Superior Court of
24 California in Ventura, 56-2021-00551166-CU-OE-VTA), Butler v. PowerSchool Group, LLC
25 (Superior Court of California in Sacramento, 34-2021-00303458), Dale v. PCC Structurals Inc.,
26 et. al. (Superior Court of California in Alameda, RG21102183), Horowitz v. Sky West Airlines
27 (Northern District of California, 3:21-cv-04674-MMC), Castillo v. Harmony Foods, LLC et. al.
28 (Superior Court of California in Santa Cruz, 21CV00961), Wightman v. Cobham Advanced

Electronic Solutions, Inc. (Superior Court of California in San Diego, 37-2021-00038124-CU-OE-CTL), Martin v. Air International US Inc. (Superior Court of California in Alameda, RG21098764), Ziperman v. Parkway Motorcars Valencia Inc., et. al. (Superior Court of California in Los Angeles, 21STCV31959), Amiri v. Grewal Foods OC Sub, Inc. dba Subway (Superior Court of California in Los Angeles, 21STCV20426), Valenzuela v. Network Medical Management, Inc. (Superior Court of California in Los Angeles, 21STCV39548), Miles v. Chico Produce Inc. (Superior Court of California in Sacramento, 00301881), Hoelzel v. Starbucks (Superior Court of California in Los Angeles, 21STCV37838), Randle- Tatum v. Hopdoddy Burger Bar, Inc. (Superior Court of California in Los Angeles, 21STCV21015), Turner v. Smithfield Distribution, LLC (Superior Court of California in Los Angeles, 21STCV23414), Balabanoff v. Classic Vacations, LLC, et. al. (Superior Court of California in Santa Clara, 21CV392334), Martin v. American Custom Private Security Inc. (Superior Court of California in San Joaquin, STK-CV-UOE-2021-8213), Brito v. Brothers International Desserts Inc. et. al. (Superior Court of California in Orange, 30-2022-01242515-CU-OE-CXC), Chavis v. Grocery Outlet, Inc. (Superior Court of California in Sacramento, 34-2021-00309003-CU-OE-GDS), Randall v. YRC Inc., et. al. (Superior Court of California in San Bernardino, CIVSB2205968), Carroll v. LA Family Housing Corporation (Superior Court of California in Los Angeles, 20STCV04474), Wilkerson v. Intuit, Inc. (Superior Court of California in San Diego, 37-2020-00030371-CU-OE-CTL), Teer v. Sabert Corporation (Superior Court of California in Riverside, RIC1905847), Felix v. Wm. Bolthouse Farms, Inc. (Eastern District of California, 1:19-CV-00312-AWI-JLT), Soto v. O'Reilly Auto Enterprises, LLC (Central District of California in Riverside, 5:20-cv-00214-JGB-KK), Kane v. Smithfield Direct, LLC (Central District of California, 21-CV-04832 PA (JCx)), North v. Jones Lang Lasalle Americas, Inc. (Superior Court of California in San Diego, 37-2019-00028271-CU-OE-CTL), among others.

7. Although I am experienced in employment and class action matters, I associated in as co-counsel on this case with Kingsley & Kingsley, who has a great deal of experience in wage and hour class action employment cases, and together our firms have and will continue to aggressively and competently represent the named plaintiff and putative class members in this

1 case.

2 8. In light of the foregoing, I am qualified to act as co-Class Counsel in this matter
3 and fully support the proposed Settlement.

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

6 This Declaration was executed on May 2, 2023 in Glendale, California.

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10 Emil Davtyan
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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 May 4, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF EMIL DAVTYAN IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Daniel K. Klingenberger dklingenberger@lebeauthelen.com LeBeau Thelen LLP 5001 E. Commercenter Drive, Suite 300 P.O. Box 12092 Bakersfield, CA 93389-2092	Emil Davtyan emil@davtyanlaw.com Davtyan Law Firm, Inc. 400 N. Brand Blvd, Suite 700 Glendale, CA 91205
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[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 TRANSMISSION: I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

[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 May 4, 2023, at Los Angeles, California.



Taylor Gregg