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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN MATEO**

SEYED RAMIN ASBAGHI, individually, and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiff,

vs.

PUTNAM CHEVROLET CADILLAC, INC.,
a California corporation; PUTNAM
CHEVROLET CADILLAC, LLC, a California
limited liability company; PUTNAM GM, an
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No.: 21-CIV-04343

Honorable Jeffrey R. Finigan
Department 24

**DECLARATION OF SEYED RAMIN
ASBAGHI IN SUPPORT OF PLAINTIFF'S
RENEWED MOTION FOR APPROVAL OF
PRIVATE ATTORNEYS GENERAL ACT
(CAL. LABOR CODE § 2698, *ET SEQ.*)
SETTLEMENT AGREEMENT**

[Notice of Motion and Renewed Motion for
Approval of Private Attorneys General Act (Cal.
Labor Code § 2698, *Et Seq.*) Settlement
Agreement; Declaration of Plaintiff's Counsel;
and [Proposed] Order and Judgment filed
concurrently herewith]

Complaint Filed: August 12, 2021
Trial Date: None Set

DECLARATION OF SEYED RAMIN ASBAGHI

I, **Seyed Ramin Asbaghi**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case, and I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendants from approximately May 2018 to approximately June 2020. I was employed as a salaried employee and misclassified as exempt. I decided to seek legal advice about my work experience at Defendants. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. After speaking with the attorneys, I investigated wage and hour and similar class action and PAGA lawsuits on my own and did some research into the leading employment law firms in California for approximately **4 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost **7 hours** discussing my situation, representative action lawsuits under the Private Attorneys General Act (“PAGA”), and what it meant to bring a PAGA action.

3. I have spent over **13 hours** meeting with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which has included providing documents concerning my employment with Defendants, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of hourly-paid employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I also periodically checked in with my attorneys and their staff to make sure that they had all my most current information and to provide them with any additional information that I had obtained.

4. I was available to answer any questions my attorneys had, and available to speak and meet with them whenever they needed me. I responded to my attorneys as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **8 additional hours** speaking with my attorneys about the case, sending them documents, identifying potential witnesses, and also describing policies, practices, and procedures of Defendants.

5. As far as the settlement is concerned, I spent about **3 hours** reviewing the settlement and related documents and asking questions and discussing the potential settlement with my attorneys.

6. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case.

7. I respectfully request that the Court approve and award me a General Release Fee in the amount of \$7,500.00 for my efforts and active participation in the case and in exchange for agreeing to provide a broader general release of claims. Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

8. I am not related to anyone associated with Lawyers *for* Justice, PC.

9. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as a general release fee, as well as my individual share of the settlement as an aggrieved employee.

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

Executed on 09/16/2024 at Oakley, California.

Electronically Signed 2024-09-16 16:54:48 UTC - 172.59.128.20
Seyed Ramin Asbaghi
Vertex AssureSign® 5368a63-c666-4684-b2d1-b1ed0115471c

Seyed Ramin Asbaghi