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[ADDITIONAL COUNSEL LISTED AFTER CAPTION]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

LAURA HERRERA, VALERIE
CHAVEZ, individually and on behalf of
others similarly situated and other
aggrieved employees,

Plaintiffs,

v.

CASCADE LIVING GROUP
MANAGEMENT, LLC, an active
Washington Limited Liability Company;
BPM SENIOR LIVING COMPANY, an
active Delaware Corporation; and DOES
1 through 10,

Defendants.

Case No.: 20STCV48606 (related to
21STCV35724)

CLASS AND REPRESENTATIVE
ACTION

*[Assigned to Hon. Stuart M. Rice
in Dept. SS-1]*

**DECLARATION OF ZORIK
MOORADIAN IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[FILED CONCURRENTLY WITH
NOTICE OF MOTION AND MOTION
FOR PRELIMINARY APPROVAL;
DECLARATION OF HAIK
HACOPIAN WITH EXHIBITS;
DECLARATION OF JAMES R.
HAWKINS; DECLARATION OF
LAURA HERRERA; DECLARATION
OF VALERIE CHAVEZ; AND
[PROPOSED] ORDER]

Date: August 14, 2023

Time: 10:30 a.m.

Dept.: SS-1

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7 Attorneys for Plaintiff, VALERIE CHAVEZ
on behalf of herself and all others similarly situated
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DECLARATION OF ZORIK MOORADIAN

I, Zorik Mooradian, declare as follows:

1. I am an attorney at law duly licensed to practice law in the state of California. I am the principal of Mooradian Law, APC and, along with Haik Hacopian, am counsel for Plaintiff Laura Herrera and seek appointment as Class Counsel in the class action lawsuit entitled *Laura Herrera, individually and on behalf of other persons similarly situated and similarly aggrieved employees v. Cascade Living Group Management, LLC, et al.*, and bearing Los Angeles County Superior Court Case No. 20STCV48606. I make this Declaration in support of Plaintiffs' Motion for Preliminary Approval based on my own personal knowledge and if called as a witness I could and would competently testify to the following facts stated herein.

2. I have attended Texas A & M University (Kingsville) and California State University Los Angeles (Los Angeles), and have received a Bachelor of Science degree in Civil Engineering in 1979. I have also attended University of La Verne College of Law, graduated and was admitted to the State Bar of California in 1988, and have been in good standing since. For the past 34 years, I have litigated hundreds of cases with numerous bench and jury trials. My most recent jury verdict was in October 2019, in a Fair Employment and Housing retaliation matter. I have also been and continue to be plaintiff's counsel in many wage and hour and consumer class actions, complex and multi-party matters.

3. The following is a short title index of class actions and individual employment/wage-and-hour cases (recent past and pending), in which I have represented and/or continue to represent the plaintiffs or defendants in the capacity of co-counsel or lead counsel:

4. Granados v. Bimbo Bakeries/CV 09-07329 DMG; Garcia v. Pharmavite /BC435699; Barsamian/Park v. Staples /BC450208 and BC449815; Bosch v. Bakery Holdings/BC484494; Uribe v. American Guard Services/ BC492881; Gamez-Flores v. Haynes Building Services/BC493709; Rodriguez v. KBS/ BC537386; Tovar v. Baron HR, LLC/ BC517984; Perez v. Valleycrest/ BC

1 538257; Uscanga v. Automotive Creations/BC509401; Gonzales v. Nefab
2 Packing/2;13-cv-04499 JAK-ss; Mendoza v. Accentcare/30-2013-00661891-CU-
3 OE-CXC; Nuno v. Universal Building Maintenance/BC541570; Cabrera v.
4 Complete Facilities Maintenance/BC538248; Valencia v. Rubbercraft/BC
5 535816; Fuentes v. Kamran Staffing/BC604535; Perez v. El Pollo
6 Loco/BC624001; Perez v. Quest Nutrition/BC630914; Escalante v. Friendly Hills
7 Country Club/BC640583; Serrano v. Noise Group/30-2017-00949440-CU-OE-
8 CXC; Bitton v. Sterling Jewelry, Inc./CIVDS1612665; Blandin v. Malibu Mgt.
9 Svcs., Inc./BC618629; Barrera v. Coast Composites, Inc./30-2017-00909572 CU-
10 OE-CJC; Aguilar v. Sweet Earth Café/19STCV13373; Avina v. Marriott/30-
11 2017-00945551; Azepita v. Eden Social Restaurants, Inc./30-2019-01077185;
12 Balaguer v. Eminent, Inc./19STCV16803; Barragan v. Golden Hotels Limited
13 Partnership/30-2018-01007420; Boch v. Merchants Building
14 Maintenance/BC681320; Bueno v. Proto Homes/19STCV20011; Cardenas v.
15 Intercon Security/19STCV11259; Castillo v. Robert's Waste/30-2018-01027486;
16 Castro v. Bee Gee Laboratories/BC712857; Contreras Teo v. Golden State
17 Foods/BC708535; Contreras Teo v. Golden State Foods/BC722540; Corona v.
18 Del Amo Hospital/19STCV24741; Cruz Ventura v. WSON-55/19STCV22958;
19 Cruel v. Andreas Elsenhans/19STCV35496; Espinoza v. Don Chava
20 Mgt./19STCV27068; Galvan v. Property Mgt. Associates/BC722781; Godoy v.
21 UCLA/19STCV04634; Gonzalez v. Toyon Catering, Inc./19STCV11369;
22 Gonzalez v. FMS Mgt./30-2019-01065563; Gutierrez v. Anaheim Denn/30-2019-
23 01092546; Guzman v. Millennium Shoes/19STCV33166; Hernandez v.
24 Township Retail Services/18STCV06709; Hernandez v. Resource Employment
25 Solutions/30-2019-01084740; Herrera v. Color Spot Nurseries/30-2017-
26 00933249; Leon v. Island Hospitality Mgt./30-2019-01060719; Martinez v.
27 Snakerz/19STCV02674; Mendoza v. Savage Service Corp./18STCV04798;
28 Martinez v. Riviera Beverages/ 30-2019-01056796; Mendoza v. United
Production Framing/30-2019-01104255; Morales Cano v. Coordinated

1 Staffing/19STCV29817; Moreno v. DCX-CHOL Enterprises/19STCV19105;
2 Moreno v. DCX-CHOL Enterprises/19STCV26247; Contoran Najera v. TOPH I,
3 LLC/30-2018-00999474; Nunez v. Wonderland Montessori,
4 LLC/18STCV06042; Enriquez v. The Johnny Rockets Group/19STCV43986;
5 Pallares - Mercado v. MB Santa Ana Restaurants/30-2019-01047135; Perez v.
6 First Rate Staffing/18STCV02057; Popoca v. Denim Technologies/
7 19STCV11434; Reidy v. City of Inglewood/18STCV09373; Rosales v. DBR
8 Premium/19STCV32726; Salceda v. GBG USA, Inc./ 18STCV10004; Salceda v.
9 GBG USA, Inc./ 18STCV04778; Torres v. Metro Security/19STCV21114; Torres
10 v. Metro Security/19STCV15680; Trujillo v. Securitas Security
11 Services/19STCV01207; Villacana v. Crothall Laundry Services,
12 Inc./19STCV16330; and Villareal v. Golden Touch Cleaning/30-2019-01108777.

13 5. I am familiar with California wage and hour law and the laws governing the
14 alleged violations in this matter, including but not limited to California Labor Code Sections
15 201 – 203, 226, 226.7, 510, 512, 1194, 1194.2, 2698 and 2802, California Business and
16 Profession Codes 17200 *et. seq.*, the Orders of the Industrial Welfare Commission, and the
17 Private Attorneys General Act.

18 6. I seek appointment as class counsel on behalf of the settlement class. I know
19 of no conflicts that would preclude me, or Mr. Hacopian, from serving as Class Counsel in
20 this matter. I also know of no conflicts that would preclude Ms. Herrera from serving as a
21 Class Representative in this matter.

22 7. As a result of my prior experience as class counsel in other wage and hour
23 class actions, I am fully aware of the responsibilities I owe as Class Counsel to the proposed
24 class in this action. Based on my experience as Class Counsel, I believe, in light of the criteria
25 identified in *Dunk v. Ford Motor Co.* (1996) 48 Cal. App. 4th 1794, 1801, that the proposed
26 settlement is fair to the class, reasonable and more than adequate in view of (i) the strength
27 of Plaintiffs' claims and Defendant's defenses, (ii) the risk, expense, complexity and likely
28 duration of further litigation, (iii) the risk and difficulty of obtaining class certification and

1 maintaining class action status through trial, (iv) the total settlement amount of \$850,000
2 offered in settlement, (v) the discovery conducted by the Parties in this case, (vi) my
3 experience with similar settlements in wage and hour class actions that have received court
4 approval, and (vii) the fact that the settlement was the result of arms' length negotiations
5 between experienced counsel facilitated by Mr. Scott S. Markus, a respected neutral
6 mediator.

7 8. I submit that the proposed settlement is within the range of possible approval
8 for communication of a notice in conformity and consideration thereof by the Settlement
9 Class. The Court will have the opportunity to again assess the reasonableness of the
10 settlement after the Class has had the opportunity to opt-out or object.

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

13 Executed on June 15, 2023, in Calabasas, California.

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16 /s/Zorik Mooradian
Zorik Mooradian
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