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Attorneys for Plaintiff Bethany A. Butler, on behalf of herself
and similarly-situated and aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

BETHANY A. BUTLER, on behalf of
herself and similarly-situated and aggrieved
employees,

Plaintiff,

v.

POWERSCHOOL GROUP LLC, a
Delaware Limited Liability Company; and
DOES 1 through 10, Inclusive,

Defendants.

Lead Case No. 34-2021-00299363-CU-OE-GDS
ASSIGNED FOR ALL PURPOSES TO:
The Honorable Jill H. Talley
Department 27

CLASS AND REPRESENTATIVE ACTION

**DECLARATION OF EMIL DAVTYAN
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT**

Date: January 5, 2024

Time: 9:00 a.m.

Dept.: 27

Judge: Honorable Jill H. Talley

Complaint filed: April 26, 2021

Trial date: Not set

1 I, Emil Davtyan, declare as follows:

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

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

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

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

17 5. My office has been appointed as Class/PAGA Counsel in numerous
18 class/PAGA actions, including De La Rosa v. The Coca Cola Company et al. (Superior Court
19 of California in Napa, 17CV000787), Harvey v. Bed Bath & Beyond of California Limited
20 Liability Company (Superior Court of California in Alameda, RG17885153), Paredes v.
21 Bottling Group LLC et. al. (Superior Court of California in Kern), Ramirez v. Harris Ranch
22 Beef Company (Superior Court of California in Fresno, 16CECG04103), Gates v. Gate
23 Gourmet, Inc. et. al. (Southern District of California, 16-cv-01084-L-AGS), Hargrave v.
24 Antelope Valley Hospital (Superior Court of California in Los Angeles, BC663252), Ramirez
25 v. Milton Roy et. al. (Superior Court of California in Los Angeles, BC 632 276), Hawkins v.
26 AvalonBay Communities (Superior Court of California in Santa Clara, 17CV316492), Jones
27 Tharpe et al. v. Sprint Corporation et al. (Superior Court of California in Los Angeles,
28 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), Stephenson v. Bakersfield Dodge, Inc. (Superior Court of California in Kern, BCV-20-102693), Bacerra v. Hugo Boss Retail, Inc. (Superior Court of California in San Diego, 37-2021-00002933-CU-OE-CTL), Walker v. Ariat International, Inc. (Superior Court of California in Alameda, HG19026439), Orr v. Petvet Care Centers (California) Inc. (Superior Court of California in Santa Clara, 19CV354063), Jimenez v. OEC Distribution Services, Inc. (Superior Court of California in San Bernardino, CIVDS1915743), Viridi v. Absolute Security International (Superior Court of California in San Bernardino, CIVDS 1909589), Raj v. First Transit, Inc (Superior Court of California in Sacramento, 34-2021-00295895-CU-OE-GDS), Marchbanks v. Torrid Administration, Inc. (Superior Court of California in San Diego, 37-2020-00008179-CU-OE-NC), among others.

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

(Superior Court of California in Kern BCV-19-102016), Higginbotham et al. v. South East Employee Leasing Services (Eastern District of California, 2:20-CV-00575-KJM-DB) Bailon v. LAFC Sports LLC (Superior Court of California in Los Angeles, 19STCV29518), Hutchinson v. G6 Hospitality LLC dba Motel 6 (Southern District of California, 3:20-cv-00270-LAB-AHG), Powell v. St. Joseph Medical Center (Superior Court of California in San Joaquin, STK-CV-UOE-2019-0011155), Jones v. Summit Therapeutics Services Inc. (Superior Court of California in Santa Clara, 19CV353991), Barksdale v. UC Davis Medical Center (Superior Court of California in Sacramento, 00269829), Springstead v. Recovery Innovations Inc., et al. (Superior Court of California in San Diego, 37-2020-00001555-CU-OE-CTL), Oceana v. Tri-City Medical Center (Superior Court of California in San Diego, 37-2019-65323-CU-OE-CTL), Maldonado v. Sit 'N Sleep, Inc. (Superior Court of California in Los Angeles, 19STCV41237), Taylor v. Populus Group, LLC (Southern District of California, 3:20-cv-00473-BAS-BLM), Lim v. Seafood City, et al. (Superior Court of California in Alameda, RG20066777), Harisis v. Starbucks Corporation (Superior Court of California in Los Angeles, 20STCV11290), Battle v. Safran Cabin (Superior Court of California in Orange, 30-2020-01140831-CU-OE-CXC), Smith v. Noia Residential Services, Inc. (Superior Court of California in Fresno, 20CECG01820), Diaz v. Recon 360, LLC (Superior Court of California in Santa Clara, 20CV370603), Rivas v. 8x8, Inc. (Superior Court of California in Santa Clara, 20cv374192), Compton v. Broadbase, Inc. (Superior Court of California in Sacramento, 34-2020-00285501-CU-OE-GDS), Marden v. CVS Pharmacy, Inc., et al. (Superior Court of California in Placer, S-CV-0045902), Godwin v. St. Mary Medical Center Foundation, et al. (Superior Court of California in Los Angeles, 20STCV45671), Tabera v. St. Elizabeth Community Hospital, et al. (Superior Court of California in San Francisco, CGC-21-589691), Morgan v. Candid Care Co. (Superior Court of California in San Francisco, 3:21-cv-01748-JSC), Richardson v. Pegasus Aviation Services, LLC (Superior Court of California in San Mateo, 21-CIV-00292), Newsome v. Graybar Electric Company, Inc. (Northern District of California, 4:21cv1000), Terronez v. ST. JOHN'S Regional Medical Center, et. al. (Superior Court of California in Ventura, 56-2021-00551166-CU-OE-VTA), Dale v. PCC Structural

1 Inc., et. al. (Superior Court of California in Alameda, RG21102183), Horowitz v. Sky West
2 Airlines (Northern District of California, 3:21-cv-04674-MMC), Castillo v. Harmony Foods,
3 LLC et. al. (Superior Court of California in Santa Cruz, 21CV00961), Wightman v. Cobham
4 Advanced Electronic Solutions, Inc. (Superior Court of California in San Diego, 37-2021-
5 00038124-CU-OE-CTL), Martin v. Air International US Inc. (Superior Court of California in
6 Alameda, RG21098764), Ziperman v. Parkway Motorcars Valencia Inc., et. al. (Superior
7 Court of California in Los Angeles, 21STCV31959), Amiri v. Grewal Foods OC Sub, Inc. dba
8 Subway (Superior Court of California in Los Angeles, 21STCV20426), Valenzuela v.
9 Network Medical Management, Inc. (Superior Court of California in Los Angeles,
10 21STCV39548), Miles v. Chico Produce Inc. (Superior Court of California in Sacramento,
11 00301881), Hoelzel v. Starbucks (Superior Court of California in Los Angeles,
12 21STCV37838), Randle- Tatum v. Hopdoddy Burger Bar, Inc. (Superior Court of California
13 in Los Angeles, 21STCV21015), Magallan v. SW Ingredients Holdings, LLC et. al. (Superior
14 Court of California in Fresno, 21CECG01943), Turner v. Smithfield Distribution, LLC
15 (Superior Court of California in Los Angeles, 21STCV23414), Balabanoff v. Classic
16 Vacations, LLC, et. al. (Superior Court of California in Santa Clara, 21CV392334), Martin v.
17 American Custom Private Security Inc. (Superior Court of California in San Joaquin, STK-
18 CV-UOE-2021-8213), Brito v. Brothers International Desserts Inc. et. al. (Superior Court of
19 California in Orange, 30-2022-01242515-CU-OE-CXC), Chavis v. Grocery Outlet, Inc.
20 (Superior Court of California in Sacramento, 34-2021-00309003-CU-OE-GDS), Randall v.
21 YRC Inc., et. al. (Superior Court of California in San Bernardino, CIVSB2205968), Carroll v.
22 LA Family Housing Corporation (Superior Court of California in Los Angeles,
23 20STCV04474), Wilkerson v. Intuit, Inc. (Superior Court of California in San Diego, 37-2020-
24 00030371-CU-OE-CTL), Teer v. Sabert Corporation (Superior Court of California in
25 Riverside, RIC1905847), Felix v. Wm. Bolthouse Farms, Inc. (Eastern District of California,
26 1:19-CV-00312-AWI-JLT), Soto v. O'Reilly Auto Enterprises, LLC (Central District of
27 California in Riverside, 5:20-cv-00214-JGB-KK), Kane v. Smithfield Direct, LLC (Central
28 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 Cohelan Khoury & Singer, 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 case.

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

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 19, 2023 in Glendale, California



Emil Davtyan