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10 Attorneys for Plaintiff Rafael Rivas, Jr., on behalf of other similarly aggrieved employees

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 FOR THE COUNTY OF ORANGE – CIVIL COMPLEX CENTER

13 RAFAEL RIVAS, JR., on behalf of other
14 similarly aggrieved employees,

15 Plaintiffs,

16 v.

17 PIPE RESTORATION, INC. DBA ACE
18 DURAFLO PIPE RESTORATION, an
19 active California Corporation; and DOES
20 1 through 10,

21 Defendants.

Case No.: 30-2021-01189254-CU-OE-CXC

REPRESENTATIVE ACTION

*[Assigned to Hon. William D. Claster
in Dept. CX-104]*

**DECLARATION OF HAIK HACOPIAN
IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF PAGA
SETTLEMENT, AND PAYMENT OF
ATTORNEYS' FEES, COSTS, AND
ENHANCEMENT AWARD**

[FILED CONCURRENTLY WITH MOTION
FOR APPROVAL; DECLARATION OF
ZORIK MOORADIAN; AND [PROPOSED]
ORDER]

Date: June 17, 2022

Time: 9:00 a.m.

Dept.: CX-104

Reservation Number: 73767131

1 **DECLARATION OF HAIK HACOPIAN**

2 I, Haik Hacopian, declare as follows:

3 1. I am an attorney at law duly licensed to practice law in the state of California.
4 I work with Mooradian Law, APC, am co-counsel for Plaintiff Rafael Rivas, Jr. in the
5 individual and representative action lawsuit entitled Rafael Rivas, Jr., individually and on
6 behalf of similarly aggrieved employees v. Pipe Restoration, and bearing Orange County
7 Superior Court Case No. 30-2021-01189254-CU-OE-CXC. I make this Declaration in
8 support of Plaintiff's Motion for Approval of PAGA Settlement and Payment of Attorneys'
9 Fees and Costs. This Declaration is based on my own personal knowledge and if called as a
10 witness I could and would competently testify to the following facts stated herein.

11 2. I am a 2010 graduate of St. John's University School of Law. I was admitted
12 to the New York State Bar in February of 2011 and was assigned Registration Number
13 4895728. I was admitted to The State Bar of California on April 25, 2012 and was assigned
14 State Bar Number 282361 and have been active and in good standing since. I have
15 been involved in the litigation of complex cases at all stages throughout my career including
16 wage and hour class actions. I am currently actively involved with numerous class action
17 matters in various litigation stages.

18 3. The following is a short title index of wage-and-hour class action cases
19 in which I have represented and/or continue to represent named plaintiff in the capacity of co-
20 counsel: Nuno v. Universal Building Maintenance/BC541570; Perez v. Quest
21 Nutrition/BC630914; Cabrera v. Complete Facilities Maintenance/BC538248; Cardenas v.
22 Iron Mountain/BC620476 (appointed as class counsel); Hernandez v. Johnny
23 Rockets/BC604536; Castro v. Advanced Cosmetic Research/BC634270; Linares v. Personal
24 Touch Cleaning/BC613182; Escalante v. Friendly Hills Country Club/BC640583 (appointed
25 as class counsel); Fuentes v. Kamran Staffing/BC604535 (appointed as class counsel);
26 Martinez v. Pampanga Food Company/BC637207; Perez v. El Pollo Loco/JCCP4957
27 (appointed as class counsel); Rosa v. Intercontinental Hotels/BC566377; Serrano v. Noise
28 (appointed as class counsel); Contreras v. Golden State Foods/BC708535; Avina v. Marriott

Vacations Worldwide/8:18-cv-00685-JVS-JPR (appointed as class counsel); Balaguer v. Eminent, Inc/19STCV16803 (appointed as class counsel).

4. I am familiar with California wage and hour law including the laws governing the alleged violations and the Orders of the Industrial Welfare Commission, and the Private Attorneys General Act (PAGA).

5. A true and correct copy of my time and cost ledger for this matter is attached hereto as **Exhibit "1"**. My standard billing rate is \$415 per hour. The attached time entries represent 47.3 hours of work I have performed on this matter, which brings my total lodestar to **\$19,629.50** (47.3 x \$415). As also reflected by the attached ledger, I have incurred **\$381.48** in costs.

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

Executed this 23rd day of May 2022, in Calabasas, California.

/s/Haik Hacopian

Haik Hacopian

HAIK HACOPIAN - TIME AND COST LEDGER - RIVAS v. PIPE RESTORATION

MIN HRS

2021	3	3	Hours		180	3	Initial review of file incl. client records to assess re potential claims and potential lawsuit filing
2021	3	4	Hours		100	1.67	Research re potential def "Pipe Restoration" and scope of operations and business
2021	3	10	Hours		50	0.83	Review employer production of documents
2021	3	14	Hours		70	1.17	Review file and draft PAGA Notice letter, upload to LWDA
2021	3	15	Costs	\$8.30			PAGA Notice Certified Postage
2021	3	15	Costs	\$75.00			LWDA PAGA Notice Fee
2021	3	15	Hours		120	2	Complaint and initial pleading preparation
2021	3	16	Costs	\$61.43			OneLegal Complaint Filing Charges
2021	3	18	Costs	\$8.30			PAGA Notice Supplement Postage Charges
2021	3	18	Hours		50	0.83	Draft and finalize PAGA supplement, upload to LWDA
2021	3	24	Hours		15	0.25	Prep NAR and fwd to counsel
2021	3	30	Hours		20	0.33	Var. init. Pleading and service related emails wdef counsel
2021	4	5	Hours		20	0.33	Review ct order and calendar dates and reminders
2021	4	28	Hours		45	0.75	Review and assess arbitration agreements produced and email to ZM; confer with client re same
2021	4	30	Hours		15	0.25	Follow up emails re arbitration
2021	5	4	Hours		20	0.33	Emails re dismissal of class allegations in light of arb agreement
2021	6	2	Hours		20	0.33	Review ct min order re recusal and made calendaring edits, review ct order re reassignment
2021	7	30	Hours		20	0.33	Follow up on file, organize re same, and circulate conformed pleadings
2021	8	11	Hours		10	0.17	Review minute order and related calendaring
2021	9	24	Hours		70	1.17	Review file and prep informal discovery request categories to def
2021	9	29	Hours		45	0.75	Work on draft of FAC
2021	9	30	Hours		20	0.33	Prep stip to continue CMC
2021	10	4	Hours		15	0.25	Review ct min order re continue and calendar dates and reminders

2021	10	6	Costs	\$15.70			OneLegal Proposed Stip/Order Filing Charges
2021	10	21	Hours		60	1	Review file re mediation and completion of necessary productio, email to def counsel
2021	11	12	Hours		240	4	Review and analyze production in anticipation of mediation, send follow up email to def counsel
2021	11	15	Hours		60	1	Review and analysis of additional employee records
2021	11	18	Hours		80	1.33	Research re travel time claim and draft memo email re strengths and weaknesses
2021	11	23	Hours		210	3.5	Draft mediation brief and damage analysis
2021	11	29	Hours		120	2	Prepare for mediation
2021	11	30	Hours		480	8	Participate in full-day mediation wLynn Frank
2021	12	6	Hours		15	0.25	Retrieve and index signed MOU and assess re next steps on file
2021	12	21	Hours		30	0.5	Prep PAGA supp per settlement
2021	12	27	Hours		20	0.33	Prep and circulate draft jt report
2021	12	29	Costs	\$36.29			OneLegal Proposed Stip/Order Filing Charges
2022	1	7	Costs	\$10.62			PAGA Notice Supplement Postage Charges
2022	1	7	Hours		50	0.83	Prep further PAGA supplement
2022	2	22	Hours		70	1.17	Review draft settlement agreement fr defense counsel and redline changes
2022	3	15	Hours		60	1	Attention to stip to file FAC and finalize FAC
2022	3	18	Hours		20	0.33	Finalize and file report and stip, related emails w def counsel
2022	3	22	Costs	\$36.80		0	OneLegal Proposed Stip/Order Filing Charges
2022	3	31	Hours		40	0.67	Review file and prep CRC 3.770 dismissal of class allegations
2022	4	4	Costs	\$16.21			OneLegal Notice Filing Fee
2022	4	5	Costs	\$20.59			OneLegal Proposed Stip/Order Filing Charges
2022	4	6	Costs	\$17.24			OneLegal Amended Complaint Filing Charges
2022	4	6	Hours		20	0.33	Retreive and review ct stip granting leave and finalize and file FAC
2022	4	22	Hours		180	3	Work on PAGA approval motion
2022	5	3	Hours		180	3	Further work on PAGA approval motion
2022	5	18	Costs	\$75.00			OneLegal PAGA Motion Filing Charges (est.)
				\$381.48	2840	47.3	