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BLAZE and GHOLAMREZA
MEDALI

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE

RAEIGN VELASQUEZ, MIKAYLA
ASEVO, and ERIC RIVAS on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiffs,

v.

TEAM BLAZE, a California Corporation;
GHOLAMREZA MEDALI, an individual;
and DOES 1 to 100, inclusive,

Defendants.

Case No. 30-2021-01187932-CU-OE-
CXC

**DECLARATION OF SARKIS A.
ATOYAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND PAGA SETTLEMENT**

Judge: Hon. Melissa R. McCormick
Date: April 25, 2024
Time: 2:00 P.M.
Dept.: CX-102

Complaint Filed: March 09, 2021
Trial Date: Not Set

I, Sarkis A. Atoyan, hereby declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts of the State of California. I am an attorney with the firm of Atkinson, Andelson, Loya, Ruud & Romo, counsel of record for Defendants Team Blaze and Gholamreza Medali ("Defendants") in this matter. The following is based on my personal knowledge, except as to matters stated on information and belief, and if called upon to testify, I could and would do so competently.

2. I am unaware of any pending related matters or actions asserting claims that will be extinguished or adversely affected by the Settlement.

3. In preparation for mediation, Defendants provided Plaintiffs with a sampling of timecard and corresponding payroll records (“Sampling”). The method used to select the putative class members for the Sampling was as follows: Team Blaze generated a list of employees that were employed by Team Blaze throughout all locations in California during the putative class period (“Class List”). Using Microsoft Excel’s random number generator, a randomized number was applied to each putative class member in the Class List. The Class List was then sorted in order of the randomized number. Then every fifth employee was selected until reaching approximately 8.5 percent of the employees in the Class List at the time of mediation, or 126 individuals from the 1,485-member class at the time of mediation.

4. Based on the records obtained by Defendant Team Blaze, approximately 79% of putative class members have a signed arbitration agreement in place.

5. With regard to the gross high/low/average payments to class members, the amount that each Participating Class Member will be eligible to receive will be calculated by dividing each Participating Class Member’s individual Workweeks by the total Workweeks of all Participating Class Members, and multiplying the resulting fraction by the Net Settlement Amount less the Fifteen Thousand Dollars and Zero Cents (\$15,000) allocated to the PAGA Group Members. Based on the current Net Settlement Amount of \$254,750.00, the following is the amounts calculated for the Individual Settlement Payments are as follows:

- a. High: \$874.50
- b. Low: \$5.91
- c. Average: \$113.79

6. The estimated settlement payments to be received by each representative plaintiff (excluding any enhancement) are as follows:

- a. Raieign Velasquez: \$135.90
- b. Mikayla Asevo: \$259.99
- c. Eric Rivas: \$307.26

7. These Individual Settlement Payments will be affected by the actual Net Settlement Amount.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct and that this Declaration was executed on this 8th day of April 2024,
3 in Pasadena, California.

4
5 
6 Sarkis A. Atoyan

PROOF OF SERVICE

(CODE CIV. PROC. § 1013A(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 am not a party to the within action; my business address is 4225 Executive Square, 7th Floor, La Jolla, California 92037-1477.

On April 10, 2024, I served the following document(s) described as DECLARATION OF SARKIS A. ATOYAN IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA SETTLEMENT on the interested parties in this action as follows:

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- ☒ **BY MAIL:** I deposited such envelope in the mail at Pasadena, California. The envelope(s) was mailed with postage thereon fully prepaid. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.
- ☒ **BY EMAIL:** Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent to the person(s) at the e-mail address(es) listed. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.
- ☒ **BY ELECTRONIC SERVICE VIA CASE ANYWHERE:** Based on the order of the Court, service by electronic transmission through Case Anywhere, and complying with *Code of Civil Procedure* § 1010.6, I caused a true and correct copy of the document(s) to be served through Case Anywhere at www.caseanywhere.com addressed to the parties shown herein appearing on the above-entitled case. The service transmission was reported as complete and a copy of the Case Anywhere Service Receipt/Confirmation Page will be maintained with the original document in this office.

Executed on April 10, 2024, at La Jolla, California.

Kaila P. Simoneit