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Attorneys for Plaintiffs,

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ORANGE

MANUEL FRANCO and ALFONSO
GUZMAN, on behalf of themselves, on behalf
of all persons similarly situated, and on behalf
of the State of California as a private attorney
general,

Plaintiffs,

vs.

STATES LOGISTICS SERVICES, INC., a
California Corporation, and DOES 1 through
50, inclusive,

Defendants.

) Case No.: **30-2022-01239095-CU-OE-CXC**

) **DECLARATION OF SAHAG
MAJARIAN II IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

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DECLARATION OF SAHAG MAJARIAN II

I, SAHAG MAJARIAN II, hereby declare:

1. I am an attorney duly licensed to practice in the State of California and am the principal of the Law Offices of Sahag Majarian II co-counsel to Plaintiff Alfonso Guzman in this action against Defendant. I have personal knowledge of the following, and if called and sworn as a witness, I could and would competently testify thereto. This declaration is made in support of final approval of the class action settlement in this case.

2. I graduated from Loyola Law School in 1990. Since my graduation, I have been in private practice primarily representing consumers against insurance companies and workers against their employers. I have devoted a significant portion of my practice to employment law and class actions, and have been appointed co-class counsel for the plaintiffs in no less than 300 wage and hour class actions. A sample of these cases are: *Ayvazi v. Ralph Grocery Company*, LASC Case No. BC 382980; *Sandoval vs. Chevron Stations, Inc.*, MCSC Case No. CV061690; *Nieves v. Roy's Worldwide, Inc.*, OCSC Case No. 06CC0076; *Corado v. Good Year Rubber Corp.*, SBSC Case No. RCV095476; *Pleitez v. Johnson Controls*, LASC Case No. BC353315; *Serrano v. BC/ Coca Cola Bottling Co. of L.A.*, LASC Case No. BC349904; *Urbina v. Valley Crest Co.*, LASC Case No. BC356023; *Moraza v. OK International*, OCSC Case No. 06CC0148; *Deluna v. Target*, LASC Case No. BC353080; *Daglian v. Staples, Inc.*, LASC Case No. BC375325; *McCoy v. Kimko*, OCSC Case No. 07CC00007; *Ayvazi v. Ralphs Grocery Company*, LASC Case No. BC382980; *Razo v. C & D Zodiac, Inc.*, OCSC Case No 07-CC01373; *Sandoval v. Chevron Stations, Inc.* MCSC Case No. CV061690; and *Gomez v. Spenuzza, Inc. et al*, RCSC Case No RIC524075.

3. In the employment class action arena, I have participated in over 300 class and/or PAGA action mediations. My participation has included extensive preparation, development of thorough knowledge of the legal issues related to certification and liability, and full immersion and

1 participation in the mediation and negotiation process. I have also been designated co-class counsel in
 2 various cases where we prevailed in contested class certification motions. These cases include *Herrera*
 3 *v. Mountain Meadow Mushroom Farms, Inc.*, SDCSC Case No. 37-2009-00092416- CU-MT-CTI;
 4 *Aguirre v. California Drop Forge, Inc.*, LASC Case No. BC374521; *Marroquin v. Swissport North*
 5 *America, Inc.*, LASC Case No. BC390001; and *Romero v. Hydraulics International, Inc.*, LASC Case
 6 No. 19STCV04463.
 7

8 4. Throughout my thirty-five year career in law, my practice has been exclusively
 9 contingent fee work. Within the class action arena, I have been designated co-class counsel in no less
 10 than 30 class actions that have settled for over \$1 million each. Given my success and experience, in
 11 my contingent fee practice I have averaged over \$850 per hour worked. Therefore, I believe it is
 12 appropriate to set my lodestar at no less than \$850 per hour in this case. This request is fair in view of
 13 the much higher rate per hour that can be justified by the broadly accepted Laffey Matrix which shows
 14 hourly rate of \$1,141 for attorneys out of law school for more than 20 years.
 15

16 5. My firm's involvement in this case has included legal research, investigation, and
 17 communication with client and co-counsel as well as attendance and participation at the mediation with
 18 the Honorable Judge William Pate. Based upon the totality of circumstances, I believe that the result
 19 achieved in this case is an extremely good outcome for all class members and aggrieved employees.
 20

21 6. Based on my experience as Class counsel in other employment cases and given the legal
 22 and factual realities presented in this case, I believe the proposed settlement is fair, reasonable and
 23 adequate for the class and the aggrieved employees.

24 7. My office was approached by Plaintiff Alfonso Guzman in March of 2021 in
 25 connection with potential employment law claims he believed he had against Defendant. After
 26 investigating the facts and analysis of the records, my co-counsels at Koul Law Firm and I proceeded
 27 with the filing of a class and PAGA actions against Defendant.
 28

8. Throughout the past fifty months, I have been involved in the handling of this case.

1 My work on this case has included pre-litigation research and investigation regarding the Labor Code
2 violations, analysis of the employment records, communication with client, and coordination of efforts
3 with my co-counsel, and attendance at the mediation leading to the resolution of the case.

4 9. I undertook this matter on a purely contingent fee basis with no guarantee that the time
5 expanded would result in any recovery or recoupment of costs. Throughout the past fifty months, I
6 have spent a total of 25.70 hours in this case (See Exhibit "A"). Based on my billing rate of \$850 per
7 hour, my unadjusted lodestar amounts of \$21,845.00.

8 10. My firm has incurred total costs of \$2,571.01 details of which are attached hereto as
9 Exhibit "B".

10 11. I do not have any conflict of interest with any of the parties in this litigation.

11 I declare under the penalty of perjury under the laws of the State of California the foregoing is true
12 and correct and this declaration is executed June 25, 2025 in Tarzana, California.

13
14
15 DocuSigned by:
16 Sahag Majarian

17 3142D9828F6E4A2
18 SAHAG MAJARIAN II

EXHIBIT "A"

LAW OFFICES OF
SAHAG MAJARIAN II

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June 23, 2025

LEGAL SERVICES

Re: GUZMAN V. STATES LOGISTICS

3/16/21	Intake; PAGA search	0.80 hours
3/17/21	Draft email to staff	0.10 hours
3/18/21	TC with client; Legal research	1.90 hours
7/6/21	TC with client; Draft email to client	1.20 hours
8/17/21	Review PAGA letter	0.70 hours
10/4/21	Review email from co-counsel	0.20 hours
2/1/22	Review Answer	0.30 hours
2/21/22	Meeting with staff	0.10 hours
2/15/24	Draft email to co-counsel	0.10 hours
05/7/24	Review email from co-counsel	0.10 hours
5/10/24	Prepare for mediation	4.50 hours
5/13/24	Prepare for mediation	5.30 hours
5/14/24	Attend mediation	7.10 hours
5/16/24	Review mediator proposal	0.20 hours
5/20/24	Draft email to co-counsel	0.10 hours
9/11/24	Review and sign settlement agreement	1.30 hours
10/15/24	Prepare declaration for preliminary approval	0.50 hours

12/23/24	Draft email to co-counsel	0.10 hours
6/7/25	Draft email to Herman	0.10 hours
6/24/25	Draft declaration for final approval	1.00 hours

Total Hours:	25.70
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Hourly Rate:	\$ 850.00
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Costs:	\$ 2,571.01
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EXHIBIT “B”

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