

BOKHOUR LAW GROUP, P.C.

Mehrdad Bokhour, Esq., CA Bar No. 285256

mehrdad@bokhourlaw.com

1901 Avenue of the Stars, Suite 450

Los Angeles, California 90067

Tel: (310) 975-1493; Fax: (310) 675-0861

VENTURE LAW, P.C.

Sam Rezvani, Esq. (Cal Bar No. 285376)

srezvani@venturelawpc.com

1901 Avenue of the Stars, Suite 450

Los Angeles, California 90067

Tel: (310) 893-3402

Attorneys for Plaintiffs and the Putative Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

HECTOR ROJAS and BRYAN ROJAS, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

ROOFING STANDARDS, INC., a California
corporation; and DOES 1-50, inclusive.

Defendants.

CASE NO.: 30-2021-01212242-CU-OE-CXC

*[Assigned to Hon. Lon F. Hurwitz,
Dept CX103]*

CLASS ACTION

**SUPPLEMENTAL DECLARATION OF
MEHRDAD BOKHOUR IN SUPPORT
OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing Information:

Date: October 27, 2023

Time: 1:30 p.m.

Dept.: CX103

1 **SUPPLEMENTAL DECLARATION OF MEHRDAD BOKHOUR**

2 I, Mehrdad Bokhour, say and declare, as follows:

3 1. I am an attorney at law, duly licensed to practice before all the Courts of the State of
4 California and I am the principal of Bokhour Law Group, P.C., co-counsel with Venture Law, P.C.,
5 and I serve as attorney of record for Plaintiffs Hector Rojas and Bryan Rojas (“Plaintiffs”) and the
6 Putative Class.

7 2. I am familiar with the file in this matter and if called as a witness I could and would
8 competently testify to the following facts of my own personal knowledge.

9 3. I submit this Supplemental Declaration in Support of Plaintiffs’ Motion for
10 Preliminary Approval of Class Action Settlement.

11 4. On August 25, 2023, the Court ordered Plaintiffs to submit a supplemental briefing
12 addressing the concerns raised by the Court in its tentative ruling.

13 **Class Notice**

14 5. The Class Notice has been revised to state that the Settlement Administrator will
15 provide a copy of the final judgment on its website.

16 6. The Class Notice has also been revised to update some dates from 2022 to 2023.

17 7. Attached hereto as **Exhibit A** is the redline version of the revised Class Notice.

18 8. Attached hereto as **Exhibit B** is the clean version of the Class Notice.

19 **Proposed Order**

20 9. The Proposed Order has been revised to identity the operative settlement agreement
21 by the ROA number of the declaration to which it is attached.

22 10. The Proposed Order has been revised to state that the Settlement Administrator will
23 provide a copy of the final judgment on its website.

24 11. The Proposed Order has been revised to include a provision regarding the Court’s
25 continuing jurisdiction to enforce the terms of the Settlement Agreement.

26 12. The Proposed Order had been revised to include a provision regarding re-mailed
27 notices and associated deadlines.

13. The Proposed Order has been revised to include the Request for Exclusion Form and Objection Form as an attached exhibit.

14. The Proposed Order provides for March 21, 2024, at 1:30pm, as the proposed date for the Final Approval hearing.

15. Attached hereto as **Exhibit C** is the redline version of the amended Proposed Order.

16. Attached hereto as **Exhibit D** is the clean version of the amended Proposed Order.

Plaintiffs' Enhancement Award

17. Plaintiffs understand the Court's concern regarding the request of \$7,500 each and will submit declarations at final approval to justify the requested enhancement award.

Notice to the LWDA

18. Plaintiffs have concurrently submitted this supplemental declaration and accompanying documents to the LWDA in accordance with Labor Code Section 2699(1)(2). The proof of submission is attached hereto as **Exhibit E**.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct on this 13th day of October 2023, at Los Angeles, California.

By: _____
Mehrdad Bokhour, Esq.

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