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Attorneys for Plaintiffs, on a representative basis and on behalf of all others similarly situated

[Additional Plaintiffs' Counsel on Next Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

LAURA BARBOZA and DAMON
POTTER, individually, on a representative
basis, and on behalf of all others similarly
situated;

Plaintiffs,

v.

RUDOLPH FOODS COMPANY, INC., an
Ohio Corporation; and DOES 1 through
20, inclusive;

Defendants.

Case No.: CIVSB2129090

*[Assigned to Hon. Judge Joseph T. Ortiz, Dept.
S17, for all purposes]*

**DECLARATION OF SAHAG MAJARIAN II
IN SUPPORT OF MOTION FOR FINAL
APPROVAL**

1 Nazo Koulloukian, SBN 263809

nazo@koullaw.com

2 KOUL LAW FIRM

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3 Los Angeles, CA 90010

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5 Attorneys for Plaintiffs, on a representative basis and on behalf of all others similarly situated

6 Sahag Majarian, II, Esq. SBN 146621

LAW OFFICES OF SAHAG MAJARIAN II

7 18250 Ventura Blvd.,

8 Tarzana, CA 91356

Telephone: (818) 609-0807 | Facsimile: (818) 609-0892

9 Attorneys for Plaintiffs, on a representative basis and on behalf of all others similarly situated

1 No. 37-2009-00092416-CU-MT-CTI; *Aguirre v. California Drop Forge, Inc.*, LASC Case No.
2 BC374521; and *Marroquin v. Swissport North America, Inc.*, LASC Case No. BC390001; and
3 *Ruiz v. JCP Logistics, Inc.*, USDC Central District Case No. 8:13-cv01908-JLS-AN.

4 4. Throughout my thirty-three year career in law, my practice has been exclusively
5 contingent fee work. Within the class action arena, I have been designated co-class counsel in no
6 less than 30 class actions that have settled for over \$1 million each. Given my success and
7 experience, in my contingent fee practice I have averaged over \$850 per hour worked. Therefore,
8 I believe it appropriate to set my lodestar at no less than \$850 per hour in this case. This request is
9 fair in view of the much higher rate per hour that can be justified by the broadly accepted Laffey
10 Matrix which shows hourly rate of \$997 for attorneys out of law school for more than 20 years.

11 5. My involvement in this case has included analysis and research relative to Labor
12 Code violations as to the employment practices of Defendant. In the process, I developed a
13 thorough knowledge of the legal issues related to liability and certification. In addition, I was
14 involved in analyzing the policies and practices of Defendant and formulating an exposure analysis
15 for the violations asserted against them. The settlement in this case was reached after a full day
16 mediation with a well-respected mediator, Steve Rotman. Based upon the totality of the
17 circumstances, I believe that the result achieved in this case is an extremely good outcome for all
18 class members.

19 6. Based on my experience as Class Counsel in prior cases and given the legal and
20 factual realities presented in this case, I believe the proposed settlement is fair, reasonable and
21 adequate for the class. As a result of my prior experience as class counsel in other class actions, I
22 am fully aware of the responsibilities I owe as Class Counsel to the Class in this action.

23 7. I was approached by Plaintiff Laura Barboza in October of 2020 in connection with
24 potential employment law claims she believed she had against Defendant. After conducting an
25 investigation of the facts and data, my co-counsel Nazo Koulloukian of Koul Law Frim and I
26 proceeded with the filing a representative action under the Private Attorney General Act against
27 Defendant. Following the filing of the case, we learned of another pending case filed by Damon
28

1 Potter against Defendant that involved similar Labor Code violations. We joined efforts with
2 counsel for Mr. Potter and proceeded to mediation with exchange of informal discovery leading to
3 the resolution upon which final approval is being sought in this action.

4 8. Throughout the past twenty four months since Ms. Barboza contacted my office, I
5 have been involved in the handling of this matter. My work on this case includes but is not limited
6 to pre-litigation research and investigation regarding the Defendants, communication with client,
7 analysis of the employment records and preparation of exposure model of damages. I was also
8 involved in coordinating an implementation of a strategy to move the case towards resolution and
9 participating in the mediation with Steve Rotman.

10 9. My law office, along with Koul Law Firm undertook this matter on a purely
11 contingent basis with no guarantee that the time expended would result in any recovery or
12 recoupment of costs. Throughout my 24 months of involvement in this matter, I have spent a total
13 of 30.30 hours in this case. Based upon my rate of \$850 per hour, my unadjusted lodestar amount
14 would be for \$25,755.00 (See Attached Exhibit "A"). I have incurred nominal costs in this case
15 that are being waived.

16 10. Based on my experience in class and representative action litigation, as well as my
17 experience with similar PAGA and class cases involving similar claims, the settlement and amount
18 being made available provides the Class and beneficiaries of the PAGA settlement with a real and
19 significant benefit. My endorsement of the Settlement is without reservation.
20

21
22 I declare under penalty of perjury under the laws of the State of California that the foregoing
23 is true and correct.

24
25 Dated: 7/21/23

26 
Sahag Majarian II

Exhibit A

LAW OFFICES OF

SAHAG MAJARIAN II

A PROFESSIONAL CORPORATION

18250 VENTURA BOULEVARD
TARZANA, CALIFORNIA 91356

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July 21, 2023

LEGAL SERVICES

Re: BARBOZA GOMEZ V. RUDOLPH FOODS

7/20/21	Client intake	1.10 hours
7/21/21	Draft email to co-counsel; TC with co-counsel	0.70 hours
7/22/21	TC with client	0.50 hours
7/25/21	Analyze records from client	1.70 hours
7/29/21	Draft email to staff	0.10 hours
10/11/21	Review draft complaint	1.20 hours
10/18/21	Review email from co-counsel	0.10 hours
3/7/22	Review email from defense counsel	0.10 hours
5/25/22	Review email from defense counsel; TC with co-counsel	0.70 hours
6/1/22	Review email from Potter counsel	0.10 hours
6/9/22	TC with Potter counsel; Review file	0.50 hours
6/28/22	Review and sign JPA; Meeting with staff	0.30 hours
10/8/22	Analyze preliminary data and file records for mediation	0.80 hours
10/12/22	Analyze additional data produced	0.90 hours
10/14/22	Review draft mediation brief	1.10 hours
10/17/22	Draft email to co-counsels re incorrect calculation of regular rate	0.50 hours
10/18/22	Prepare for mediation	3.50 hours

10/19/22	Prepare for mediation	4.20 hours
10/20/22	Attend mediation with Steve Rotman	8.70 hours
10/27/22	Review MOU; Meeting with staff re client Signature	0.30 hours
2/6/23	Review long form settlement agreement	1.60 hours
4/19/23	Review order re preliminary approval	0.20 hours
6/21/23	Review amended order granting preliminary Approval	0.30 hours
7/14/23	Review updated reports form Phoenix	0.20 hours
7/21/23	Prepare declaration for final approval	0.90 hours

Total Hours: 30.30

Hourly Rate: \$ 850.00

Total Costs: \$ Waived