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[Additional Counsel on Next Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN BERNARDINO

CHRISTINA ABDELMALAK and PAZ
SALVADOR, on behalf of all Aggrieved
Employees and the State of California;

Plaintiff,

vs.

PRIME HEALTHCARE ANAHEIM, LLC, a
Delaware Limited Liability Company; and
DOES 1 through 20, inclusive;

Defendants.

Case No.: CIVSB2127232

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

**DECLARATION OF MEHRDAD
BOKHOUR IN SUIPPORT OF MOTION
TO APPROVE SETTLEMENT
PURSUANT TO THE PRIVATE
ATTORNEYS GENERAL ACT OF 2004**

*Filed Concurrently with: (1) [Proposed]
Order, and (2) Declarations in Support
Thereof*

Hearing

Date: January 7, 2026

Time: 1:30 p.m.

Dept.: S17

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1. I am an attorney at law, duly licensed to practice before all the Courts of the State of California, and I am the principal of Bokhour Law Group, P.C. as attorney of record for Plaintiffs and the Aggrieved Employees.

PAGA Counsel Are Experienced Class and PAGA Litigators

4. Before beginning my legal career, I served as a judicial extern for the Honorable Justice Fred Woods of the Second District Court of Appeal, Division Seven. I was also an appellate law clerk at Greines, Martin, Stein & Richland LLP.

6. I have handled approximately 250 employment litigation matters during my 13-year practice. Over the last ten years, my practice has exclusively represented employees, most of which included class action and representative action wage and hour matters. I have been appointed by various courts as Class Counsel and have received final court approval and judgment in numerous class actions. I anticipate receiving final approval in many more in the future.

DECLARATION OF MEHRDAD BOKHOUR

1 8. I was selected as a “Super Lawyer Rising Star” in Employment Litigation from
2 2017 through 2022 and as a “Super Lawyer” in 2023 through 2025. This distinction is reserved
3 for the top 2.5% of lawyers in the practice area. I have also been recognized by TopVerdicts.com
4 for achieving several of the top wage and hour class and PAGA action settlements in California.

5 9. I am an active member of the California Employment Lawyers Association
6 (“CELA”) and have attended numerous Continuing Legal Education courses on employee
7 advocacy.

8 10. My firm has the experience, resources, and means necessary to allow us to
9 provide adequate representation to all Settlement Class Members in this Action.

10 11. Currently, my firm is acting as co-counsel in at least fifty wage-and-hour class
11 actions.

12 **The Requested Attorneys’ Fees and Costs are Fair, Reasonable, and Appropriate**

13 12. Counsel’s application for an award of Attorneys’ Fees in an amount of
14 approximately one-third of the Settlement Amount on behalf of the Settlement Class is
15 reasonable and fair. The requested fee falls within the lower end of the Ninth Circuit's historical
16 benchmark for attorneys’ fees, which ranges from 20% to 40% of a common fund. It is fair
17 compensation for undertaking complex, risky, expensive, and time-consuming litigation on a
18 contingent basis.

19 13. For PAGA Counsel, the fees here were wholly contingent in nature, and the case
20 presented far more risk than the usual contingent fee case. There was the prospect of the
21 enormous cost inherent in class action litigation and a long battle with a corporate Defendant.
22 That prospect has become a reality in trial courts and the Court of Appeal in other wage and
23 hour class litigations. PAGA Counsel risked not only a great deal of time but also a great deal
24 of expense to ensure the successful litigation of this action on behalf of all Settlement Class
25 Members. Based upon the foregoing, PAGA Counsel respectfully requests that the Court award
26 Attorneys’ Fees as requested.

27 14. I will have worked approximately 85 hours on this case, and my hourly rate is
28 \$750. Accordingly, this results in a total lodestar amount of \$63,750.

1 15. The ultimate result was far from certain. When this case was taken on a
2 contingency fee basis, the firm agreed to assume responsibility for all litigation costs. In the
3 course of this Action, PAGA Counsel paid all costs, including filing fees, court costs, research
4 fees, and mediation costs. There was never a guarantee that we would recoup those expenditures.

5 16. It has been my experience that the benchmark for an attorney fee award in
6 California state cases is one-third of a common settlement fund, a standard upheld by the
7 California Supreme Court in the *Robert Half* case. Here, in accordance with the Settlement
8 Agreement, PAGA Counsel is seeking a fee of one-third of the Settlement Amount.

9 17. The fee is warranted because of the results achieved for the Settlement Class
10 Members, both in terms of the immediate cash settlement and the fact that the Settlement Class
11 Members resoundingly supported the Settlement. Defendant does not oppose this fee request.

12 18. Pursuant to California Rule of Court 3.769, Class Counsel hereby discloses the
13 existence of a Joint Prosecution and Fee Splitting Agreement among the counsel representing
14 plaintiffs in the litigation. Counsel further represents that the material terms of the JPA, including
15 the fee splitting arrangement, were disclosed to the named Plaintiffs, and that each named Plaintiff
16 reviewed and signed the JPA acknowledging and approving the disclosures and arrangement.
17 Under this agreement, any attorneys' fees awarded by the Court will be allocated among counsel
18 as follows:

- 19 • Bokhour Law Group, P.C. – 33.33%;
- 20 • Lauby, Mankin & Lauby LLP– 33.33%; and
- 21 • Blumenthal Nordrehaug Bhowmik De Blouw LLP– 33.34%

22 19. The following are the itemized litigation costs (actually incurred) for the above-
23 referenced matter:

24	(1)	Filing Fees	\$249.80
	(2)	Expert Fees	\$3,492
25	(3)	Mediation Fees	\$2,250
	(4)	CourtCall	\$94
26	(5)	Total	\$6,085.80

1 I declare under penalty of perjury under the laws of California that the foregoing is true
2 and correct, this 4th day of December 2025, at Los Angeles, California.

3 /s/ Mehrdad Bokhour

4 Mehrdad Bokhour