

ZAKAY LAW GROUP, APLC
Shani O. Zakay (State Bar #277924)
Jackland K. Hom (State Bar #327243)
5440 Morehouse Drive, Suite 3600
San Diego, CA 92121
Telephone: (619) 255-9047
Facsimile: (858) 404-9203

Attorneys for Plaintiffs and the Proposed Class

[Additional Counsel Listed on Next Page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

REYNALDO RIOS, individually, and on
behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act;

Plaintiff,

v.

ABILITY COUNTS, INC., a California
corporation; MOHENI GAJI, individually;
and DOES 1 through 100, inclusive,

Defendants.

REYNALDO RIOS, individually, and on
behalf of other members of the general
public similarly situated; MICHELLE
CHASE, individually, and on behalf of other
members of the general public similarly
situated;

Plaintiff,

v.

ABILITY COUNTS, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: CVRI2104367 (lead case)
[Consolidated with Case No. CVRI2105433]

**DECLARATION OF VARTAN MADOYAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: September 22, 2025

Time: 8:30 a.m.

Reservation ID: 067215178570

Judge: Hon. Harold W. Hopp

Dept.: 1

Action Filed: November 29, 2021

1 **JCL LAW FIRM, APC**

Jean-Claude Lapuyade (State Bar #248676)

2 5440 Morehouse Drive, Suite 3600

San Diego, CA 92121

3 Telephone: (619) 599-8292

Facsimile: (619) 599-8291

4 Joanna Ghosh (SBN 272479)

5 Vartan Madoyan (SBN 279015)

6 **LAWYERS for JUSTICE, PC**

450 North Brand Blvd., Suite 900

Glendale, California 91203

7 Telephone: (818) 265-1020

Facsimile: (818) 265-1021

DECLARATION OF VARTAN MADOYAN

I, Vartan Madoyan, declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiffs Reynaldo Rios (“Plaintiff Rios”) and Michelle Chase (“Plaintiff Chase”) (together, the “Plaintiffs”). The facts set forth in this declaration are within my personal knowledge or based on information and belief, and if called as a witness, I could and would competently testify thereto.

2. On September 17, 2021, Plaintiff Rios filed the above-captioned PAGA Action complaint, alleging a single cause of action for Violation of the California Labor Code § 2698, et seq. (California Labor Code Private Attorneys General Act of 2004). On November 29, 2021, Plaintiff Rios filed his Class Action complaint, Case No. CVRI2105433, which was later consolidated with the PAGA Action. The Class Action complaint alleges ten causes of action for: (1) Violation Of Cal. Labor Code § 2699, (Private Attorneys General Act), (2) Violation of Cal. Labor Code §§ 510, 1194, and 1198 (Unpaid Overtime), (3) Violation of Cal. Labor Code §§ 226.7 and 512(a) (Unpaid Meal Period Premiums), (4) Violation of Cal. Labor Code § 226.7, (Unpaid Rest Period Premiums) (5) Violation of Cal. Labor Code §§ 1194, 1197 and 1197.1 (Unpaid Minimum Wages), (6) Violation of Cal. Labor Code §§ 201, 202 and 203 (Final Wages Not Timely Paid) (7) Violation of Labor Code §§ 204, 210 and 218.5 (Wages Not Timely Paid During Employment) (8) Violation of Cal. Labor Code §§ 2800 and 2802 (Failure to Reimburse Necessary Business Expenses) (9) Violation of § 226 (Failure to Provide Accurate Itemized Wage Statements) and (10) Violation of California Labor Code § 1174(d) (Failure To Keep Requisite Payroll Records). On April 13, 2022, a First Amended Complaint was filed in the Class Action for purposes of adding Plaintiff Michelle Chase as a named plaintiff. The Class Action and PAGA Action were deemed consolidated by this Court.

3. Months before filing the PAGA Action and Class Action, respectively, Class Counsel began its pre-filing investigation into the complaints. Class Counsel’s investigation started with several lengthy interviews with Plaintiff Reynaldo Rios, and later Plaintiff Michelle Chase prior to the amendment which joined her as a named plaintiff. As part of the interview process, Plaintiffs provided detailed

1 information related to their employment. Class Counsel subsequently determined that the claims justified
2 further inquiry and investigation.

3 4. Class Counsel requested Plaintiffs' employee files from Defendants. In response,
4 Defendants produced several documents, including but not limited to, copies of Plaintiffs' payroll records,
5 time records, personnel files, and various company policies. Class Counsel reviewed and analyzed the
6 documents and determined the documents appeared to substantiate Plaintiffs' claims that Defendants
7 failed to, among other things, provide compliant meal and rest periods, and failed to pay for all hours
8 worked, failed to reimburse necessary business expenses, and failure to furnish accurate itemized wage
9 statements.

10 5. The parties engaged in extensive informal discovery and investigation leading up to
11 mediation on September 18, 2023. Prior to the mediation, my office requested and received class member
12 and aggrieved employee data for purposes of the mediation, including timekeeping data and payroll data
13 for class members and aggrieved employees, the total number of class members, the total number of
14 aggrieved employees, total workweeks, total pay periods, applicable employee handbooks and policies
15 related to payment of wages, meal and rest periods, timekeeping, expense reimbursement, and other
16 documents relevant to the litigation. In total, Defendants produced thousands of pages of relevant
17 documents and data prior to the mediation.

18 6. In addition to the above-referenced efforts, the Parties held numerous meetings and
19 informal conferences prior to the mediation wherein information and theories of the cases and Defendants'
20 defenses were discussed. The Parties also submitted detailed mediation briefs, which outlined the Parties'
21 respective positions.

22 7. On September 18, 2023, the Parties participated in a full-day mediation with Henry J.
23 Bongiovi, Esq. Mr. Bongiovi was agreed to by the Parties based on his excellent skills and experience as
24 a mediator in wage-and-hour class actions such as this one. The Parties did not reach a settlement during
25 the mediation, but the Parties continued to engage in subsequent negotiations with the aid of the mediator
26 for several months, and ultimately reached a resolution. Thereafter, the Parties negotiated the long-form
27 Settlement Agreement, which is now presented to the Court for preliminary approval.

1 8. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
2 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
3 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is attorney
4 of record in dozens of employment-related putative class actions in both state and federal courts in the
5 State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex
6 wage-and-hour class and Private Attorneys General Act (“PAGA”) representative actions. The firm has
7 successfully litigated cases involving nearly every aspect of California wage and hour law, including
8 payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for
9 same, timely payment of wages, provision of compliant wage statements, reimbursement of business
10 expenses, executive, administrative, and other overtime exemptions to the State of California and federal
11 overtime compensation requirements, PAGA claims, and sister statutes under federal law. Lawyers *for*
12 Justice, PC has recovered (sometimes in association with other law firms) millions of dollars on behalf of
13 thousands of individuals in California. Below is a summary of the experience and qualifications of
14 attorneys at Lawyers *for* Justice, PC (additional staff have also worked on the matter).

15 9. Edwin Aiwarzian is the Managing Member and Shareholder of Lawyers *for* Justice, PC.
16 He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris
17 Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal
18 education and training in dispute resolution and negotiation from the Straus Institute for Dispute
19 Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously
20 served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained
21 a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he
22 studied Legal Writing at Harvard University. From approximately September 2002 to approximately
23 December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United
24 States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August
25 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal
26 for the Second Appellate District. In December of 2004, he obtained a license to practice law from the
27 California State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he
28 has almost exclusively focused on the prosecution of consumer and employment class actions. While

1 employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended
2 over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and
3 attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and
4 in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive,
5 administrative, and other overtime exemptions to the State of California and federal overtime
6 compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained
7 class certification by contested motion practice in approximately fifteen (15) cases in the last decade and
8 litigated over 1,000 class action or representative action cases.

9 10. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He received his
10 Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He
11 earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007
12 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the
13 California Court of Appeal for the Second Appellate District. From approximately August 2008 to
14 approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw
15 of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California
16 in 2010. He is admitted to practice before all courts of the State of California and all United States District
17 Courts in the State of California. He has worked on many wage-and-hour class action and representative
18 action cases, taking the lead in taking and defending depositions, arguing motions, and attending
19 mediations. He has played an integral role in preparing matters for class certification, including and not
20 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court
21 Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.
22 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No.
23 RG13680477). Under his supervision, dozens of class action or representative cases have resulted in
24 settlements that have been granted court approval, including and not limited to, those listed in paragraph
25 11 herein. He has handled over one hundred and fifty (150) mediations and worked on over two hundred
26 and fifty (250) class action or representative action cases which have resulted in settlement.

27 11. Joanna Ghosh is a Senior Member of Lawyers *for* Justice, PC. She received a Bachelor
28 of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from

1 the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law
2 Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013) and
3 is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the
4 Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of
5 depositions and successfully handled motion practice in class action cases regarding discovery (including
6 and not limited to, regarding class contact information), class certification (both contested class
7 certification and stipulated class certification), arbitration agreements, coordination, and intervention. She
8 has successfully handled briefing and oral argument on appeal and obtained notable decisions regarding
9 the Private Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v.*
10 *Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24,
11 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th175. She has
12 significant experience with class actions, including and not limited to working on cases to obtain class
13 certification through contested motion practice and working on cases in the post-certification stage (e.g.,
14 post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in
15 conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600
16 individuals). She also has extensive experience with class action and/or representative action settlements
17 and has handled this process in over three hundred (300) cases. Under her, Edwin Aiwazian, and Arby
18 Aiwazian's supervision, the firm has handled the class certification and court approval process for
19 hundreds of class action and/or representative action matters that have successfully resolved. She is a
20 member of the California Employment Lawyers Association.

21 12. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree in
22 Economics from the University of California, San Diego in 2007, and a Juris Doctor degree from Loyola
23 Law School in 2011, graduating with Cum Laude and Order of the Coif honors. I am admitted to practice
24 before all courts in the State of California and all U.S. District Courts in California. I externed for the
25 Honorable Victoria S. Kaufman of the United States Bankruptcy Court, Central District of California,
26 from June 2009 to August 2009. I externed for the Honorable Gary A. Feess of the United States District
27 Court, Central District of California, from January 2010 to May 2010. From 2011 through and including
28 the present, I have practiced almost exclusively on complex wage and hour class action and PAGA action

1 matters in California. From October 2011 to June 2013, I was an Associate at Littler Mendelson's Century
2 City, California office, working for one of the largest employer-side labor and employment law firms in
3 the United States. From July 2013 to March 2014, I was an Associate at Sheppard, Mullin, Richter &
4 Hampton's Century City, California office. From March 2014 to July 2023, I worked as an Associate and
5 then as Counsel at Baker Hostetler LLP's Los Angeles office. From August 2023 to the present, I have
6 been a Member of Lawyers *for* Justice, PC. I have taken and defended dozens of depositions and have
7 successfully handled motion practice in class action and PAGA cases regarding discovery (including and
8 not limited to motions regarding class contact information), class certification (both contested class
9 certification and stipulated class certification), dispositive motions, arbitration agreements, coordination,
10 and intervention. I have successfully handled a complex wage and hour class action and PAGA case
11 through a trial verdict in the matter of *Estrada v. Royalty Carpet Mills*, Orange County Superior Court,
12 Case No. 30-2013 00692890. I have also successfully handled briefing on appeal regarding employer
13 efforts to compel arbitration. *TitleMax of Cal. v. Pena*, California Court of Appeals for the Fifth District,
14 Case No. F084706 (Cal. Ct. App. March 28, 2023) (unpublished decision). Further, I have extensive
15 experience with settlements of class actions and PAGA actions and have handled and supervised this
16 process in over one hundred (100) cases.

17 13. What follows are just a few examples of the type of results Lawyers *for* Justice,
18 PC ("LFJ") has achieved on behalf of its clients:

19 a) LFJ, in association with co-counsel therein, represented the plaintiffs in a
20 wage-and-hour class action against a major property management company involving allegations
21 of misclassification of various "manager" positions. On September 20, 2010, the court granted
22 final approval of the class action settlement. The Los Angeles County Superior Court Case
23 Number is BC400414.

24 b) LFJ, in association with co-counsel therein, represented the plaintiffs in a
25 wage-and-hour class action against a national retailer of household items involving allegations of
26 misclassification of the "Assistant Store Manager" position. On October 28, 2010, the court
27 granted final approval of the class action settlement. The Los Angeles County Superior Court
28 Case Number is BC413498.

1 c) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class action against a national property management company involving
3 allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court
4 granted final approval of the class action settlement. The Los Angeles County Superior Court
5 Case Number is BC430918.

6 d) LFJ, in association with co-counsel therein, represented the plaintiffs in a
7 wage-and-hour class action against a national retailer involving allegations of misclassification
8 of the “Store Manager” position. On June 10, 2011, the court granted plaintiffs’ motion for class
9 certification. On August 26, 2013, the court granted final approval of the class action settlement.
10 The Los Angeles County Superior Court Case Number is BC424012.

11 e) LFJ, in association with co-counsel therein, represented the plaintiff in a
12 wage-and-hour class and PAGA representative action against a bank, involving allegations of
13 misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court
14 granted final approval of the class and PAGA representative action settlement. The Kern County
15 Superior Court Case Number is S-1500-CV-273194-LHB.

16 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
17 wage-and-hour class and PAGA representative action against a national wholesale distributor of
18 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
19 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
20 representative action settlement. The Sacramento County Superior Court Case Number is 34-
21 2012-00136285.

22 g) LFJ, in association with co-counsel therein, represented the plaintiff in a
23 wage-and-hour class action against a multinational corporation that provides global workplace
24 solutions, involving allegations of misclassification of the “Operations Manager” position. On
25 September 16, 2014, the court granted plaintiff’s motion for class certification. The Los Angeles
26 County Superior Court Case Number is BC478769.

27 h) LFJ, in association with co-counsel therein, represented the plaintiff in a
28 wage-and-hour class and PAGA representative action against a national retailer of household

1 items, on behalf of hourly-paid or non-exempt employees. On May 27, 2015, the court granted
2 final approval of the class and PAGA representative action settlement. The San Francisco County
3 Superior Court Case Number is CGC-13-532344.

4 i) LFJ, in association with co-counsel therein, represented the plaintiff in a
5 wage-and-hour class and PAGA representative action involving allegations of misclassification
6 of the salaried residential “Property Manager” position. On September 17, 2015, the court granted
7 plaintiff’s motion for class certification. On October 20, 2017, the court granted final approval
8 of the class and PAGA representative action settlement. The Los Angeles County Superior Court
9 Case Number is BC474784.

10 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a
11 wage-and-hour class and PAGA representative action against a national retailer of upscale
12 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the
13 court granted final approval of the class and PAGA representative action settlement. The Los
14 Angeles County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial
15 Council Coordination Proceeding Number is 4794.

16 k) LFJ, in association with co-counsel therein, represented the plaintiffs in a
17 wage-and-hour class action against a national retailer of apparel and fashion accessories, on behalf
18 of non-exempt employees. On August 5, 2016, the court granted final approval of the class action
19 settlement. The Los Angeles County Superior Court Case Number is BC488069.

20 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
21 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
22 involving allegations of misclassification of the “Department Manager” position. On August 12,
23 2016, the court granted the plaintiffs’ motion for class certification in part and certified a
24 class. On August 6, 2019, the court granted final approval of the class action settlement. The
25 Alameda County Superior Court Case Number is RG13680477.

26 m) LFJ represented the plaintiff in a PAGA representative action against a real
27 estate and property management company, on behalf of non-exempt employees. On November 4,
28 2016, the court granted approval of the PAGA representative action settlement. The Orange

1 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

2 n) LFJ, in association with co-counsel therein, represented the plaintiffs in a
3 wage-and-hour class and PAGA representative action against a full-service bank, on behalf of
4 non-exempt employees. On November 18, 2016, the court granted final approval of the class and
5 PAGA representative action settlement. The San Francisco County Superior Court Case Number
6 is CJC-13-004839 and the Judicial Council Coordination Proceeding Number is 4839.

7 o) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
8 representative action against a foodservice distributor, on behalf of non-exempt employees. On
9 January 26, 2017, the court granted final approval of the class and PAGA representative action
10 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

11 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
12 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to
13 the employer's motion to compel arbitration, which resulted in a published opinion by the
14 California Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall*
15 *Supply* (Cal. App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S.
16 Supreme Court Docket No. 17-254). The Riverside County Superior Court Case Numbers are
17 RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is
18 5046.

19 q) LFJ, in association with co-counsel therein, represented the plaintiffs in a
20 wage-and-hour class and PAGA representative action against a consumer packaging company,
21 on behalf of non-exempt employees. On March 10, 2017, the court granted final approval of the
22 class and PAGA representative action settlement. The Los Angeles County Superior Court Case
23 Number is BC590429.

24 r) LFJ, in association with co-counsel therein, represented the plaintiffs in a
25 wage-and-hour class and PAGA representative action against a manufacturer of food service
26 industry supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final
27 approval of the class and PAGA representative action settlement. The Orange County Superior
28 Court Case Number is 30-2015-00810013-CU-OE-CXC.

1 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class and PAGA representative action against a lumber and hardware company
3 on behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the
4 class and PAGA representative action settlement. The Orange County Superior Court Case
5 Number is 30-2014-00747750-CU-OE-CXC.

6 t) LFJ represented the plaintiff in a wage-and-hour class and PAGA
7 representative action against a property management company, on behalf of non-exempt
8 employees. On June 14, 2017, the court granted final approval of the class and PAGA
9 representative action settlement. The Los Angeles County Superior Court Case Number is
10 BC586234.

11 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
12 representative action against a food company on behalf of non-exempt employees. On June 30,
13 2017, the court granted final approval of the class and PAGA representative action settlement.
14 The Sacramento County Superior Court Case Number is 34-2015-00175871.

15 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
16 representative action against a chocolate company on behalf of non-exempt employees. On July
17 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
18 The Alameda County Superior Court Case Number is RG15764300.

19 w) LFJ represented the plaintiff in a PAGA representative action, against the
20 parent company of several restaurants, on behalf of hourly-paid, non-exempt employees. On
21 October 18, 2017, the court granted approval of the PAGA representative action settlement. The
22 Los Angeles County Superior Court Case Number is BC569664.

23 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
24 representative action against a manufacturer of plastic containers on behalf of non-exempt
25 employees. On October 31, 2017, the court granted final approval of the class and PAGA
26 representative action settlement. The Los Angeles County Superior Court Case Number is
27 BC577233.

1 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
3 employees. On December 11, 2017, the court granted final approval of the class and PAGA
4 representative action settlement. The Los Angeles County Superior Court Case Number is
5 BC569646.

6 z) LFJ, in association with co-counsel therein, represented the plaintiffs in a
7 wage-and-hour class and PAGA representative action against a property management company
8 on behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court granted final
9 approval of the class and PAGA representative action settlement. The Los Angeles County
10 Superior Court Case Number is JCCP4819 and the Judicial Council Coordination Proceeding
11 Number is 4819.

12 aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a
13 wage-and-hour class and PAGA representative action against a global provider of flexible office
14 space solutions. On February 15, 2018, the court granted final approval of the class and PAGA
15 representative action settlement. The Los Angeles County Superior Court Case Number is
16 BC498401.

17 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a
18 wage-and-hour class action against a container manufacturer, on behalf of non-exempt
19 employees. On October 15, 2018, the court granted the plaintiff's motion for class certification.
20 The Tulare County Superior Court Case Number is VCU264528.

21 cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
22 representative action against a behavioral health service provider on behalf of non-exempt
23 employees. On November 13, 2018, the court granted final approval of the class and PAGA
24 representative action settlement. The Alameda County Superior Court Case Number is
25 RG16811450.

26 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
27 PAGA representative action against a global provider of products and services to the energy
28 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court

1 granted approval of the PAGA representative action settlement. The Kern County Superior Court
2 Case Number is S-1500-CV-280215-SDC.

3 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a
4 wage-and-hour class action against a parking company on behalf of non-exempt employees. On
5 September 3, 2019, the court granted the plaintiff's motion for class certification and certified a
6 class. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial
7 Council Coordination Proceeding Number is 4886.

8 ff) LFJ, in association with co-counsel therein, represents the plaintiffs in a
9 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
10 employees. On September 27, 2019, the court granted the plaintiffs' motion for class certification
11 in part and certified a class. The Alameda County Superior Court Case Number is RG15757606
12 and the Judicial Council Coordination Proceeding Number is 4921.

13 gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a
14 wage-and-hour class and PAGA representative action against a national retailer of apparel and
15 fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted
16 the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the
17 court granted final approval of the class and PAGA representative action settlement. The
18 Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

19 hh) LFJ, in association with co-counsel therein, represents the plaintiff in a
20 wage-and-hour class and PAGA representative action against a medical equipment supplier on
21 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
22 for class certification and certified a class. The San Bernardino County Superior Court Case
23 Number is CIVDS1505744.

24 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
25 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
26 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
27 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
28 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted

1 approval of the PAGA representative action settlement. The San Diego County Superior Court
2 Case Number is 34-2015-00175330.

3 jj) Lfj, in association with co-counsel therein, represents the plaintiff in a
4 wage-and-hour class and PAGA representative action against a large national drug testing
5 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the
6 plaintiff's motion for class certification and certified a class. The San Diego County Superior
7 Court Case Number is 37-2018-00019611-CU-OE-CTL.

8 kk) Lfj, in association with co-counsel therein, represents the plaintiffs in a
9 wage-and-hour class and PAGA representative action against a national retailer of sportswear,
10 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020, the
11 court granted in part the plaintiff's motion for class certification and certified a class. The
12 Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the
13 Judicial Council Coordination Proceeding Number is 4930.

14 ll) Lfj, in association with co-counsel therein, represents the plaintiffs in a
15 wage-and-hour class action against manufacturer and supplier of power products and services on
16 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion
17 for class certification and certified a class. The San Diego County Superior Court Case Number
18 is 37-2015-00025968-CU-OE-CTL.

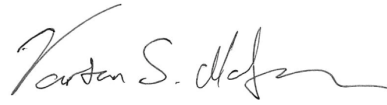
19 mm) Lfj represents the plaintiff in a wage-and-hour class action against a
20 nutritional products manufacturer on behalf of non-exempt production line employees. On
21 December 13, 2021, the court granted the plaintiff's motion for class certification in part and
22 certified a class. The Solano County Superior Court Case Number is FCS051001.

23 14. Several attorneys at Lawyers for Justice, PC have worked on the class and PAGA actions
24 since their inception. Our work with Zakay Law Group, APLC, and JCL Law Firm, APC, in the pursuit
25 of Plaintiffs' actions has been a coordinated and combined effort.

26 15. I believe that the settlement with Defendants for the consideration and on the terms set
27 forth in the Settlement Agreement is fair, reasonable, adequate and is in the best interest of the Class in
28 light of all known risks, facts and circumstances. These risks include: the risk of significant delay in class

1 members receiving any type of funds; risks associated with contested class certification law and motion
2 practice; the defenses asserted by Defendant, including that Defendant's policies and practices complied
3 with California law and the matters at issue will require individualized issues that make class certification
4 inappropriate, and the potential for prolonged appeal.

5 I declare under penalty of perjury under the laws of the United States and the State of
6 California that the foregoing is true and correct. Executed on July 17, 2025, in Glendale, California.

7
8 

9
10 _____
11 Vartan Madoyan
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28