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Attorneys for Plaintiff Gabriela Chavez, on behalf of herself
and other similarly-situated employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF MONTEREY

GABRIELA CHAVEZ, on behalf of herself
and other similarly-situated employees

Plaintiff,

v.

SCHEID VINEYARDS INC., a Delaware
Corporation; and DOES 1 Through 10,
inclusive,

Defendants.

Case No. 21CV002126

CLASS ACTION (COMPLEX)

**DECLARATION OF SAHAG MAJARIAN II
IN SUPPORT OF MOTION FOR AN ORDER
GRANTING PRELIMINARY APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT**

Date: December 16, 2022

Time: 8:30 a.m.

Dept: 14

Judge: Hon. Carrie M. Panetta

Complaint filed: July 2, 2021

Trial date: Not set

1 I, Sahag Majarian II, declare:

2 1. I am an attorney duly licensed to practice in the State of California. I am the
3 principal of the Law Offices of Sahag Majarian II, and am one of the attorneys of record for
4 Plaintiff Gabriela Chavez in this action against Defendant Scheid Vineyards Inc. I have personal
5 knowledge of the following, and if called and sworn as a witness, I could and would
6 competently testify thereto. This declaration is made in support of preliminary approval of the
7 class action settlement in this case.

8 2. I graduated from Loyola Law School in 1990. Since my graduation, I have been
9 in private practice primarily representing consumers against insurance companies and workers
10 against their employers. I have devoted a significant portion of my practice to employment law
11 and class actions, and have been appointed co-class counsel for the plaintiffs in no less than 50
12 wage and hour class actions. A sample of these cases are: *Ayvazi v. Ralph Grocery Company*,
13 LASC Case No. BC 382980; *Sandoval vs. Chevron Stations, Inc.*, MCSC Case No. CV 061690;
14 *Nieves v. Roy's Worldwide, Inc.*, OCSC Case No. 06CC0076; *Corado v. Good Year Rubber*
15 *Corp.*, SBSC Case No. RCV095476; *Pleitez v. Johnson Controls*, LASC Case No. BC353315;
16 *Serrano v. BCI Coca Cola Bottling Co. of L.A.*, LASC Case No. BC349904; *Urbina v. Valley*
17 *Crest Co.*, LASC Case No. BC356023; *Moraza v. OK International*, OCSC Case No.
18 06CC0148; *DeLuna v. Target*, LASC Case No. BC353080; *Daglian v. Staples, Inc.*, LASC
19 Case No. BC375325; *McCoy v. Kimko*, OCSC Case No. 07CC00007; *Razo v. C & D Zodiac*,
20 *Inc.*, OCSC Case No. 07-CC01373; and *Gomez v. Spenuzza, Inc. et al*, RCSC Case No
21 RIC524075.

22 3. In the employment class action arena, I have participated in over 300 class action
23 mediations. My participation has included extensive preparation, development of thorough
24 knowledge of the legal issues related to certification and liability, and full immersion and
25 participation in the mediation and negotiation process. I have also been designated co-class
26 counsel in various cases where we prevailed in contested class certification motions. These
27 cases include *Herrera v. Mountain Meadow Mushroom Farms, Inc.*, SDCSC Case No. 37-2009-
28 00092416-CU-MT-CTI; *Aguirre v. California Drop Forge, Inc.*, LASC Case No. BC374521;

1 and *Marroquin v. Swissport North America, Inc.*, LASC Case No. BC390001.

2 4. My participation in this case has included legal research, extensive preparation,
3 development of a thorough knowledge of the legal issues related to certification and liability,
4 and full immersion and preparation for the mediation. The settlement in this case was reached
5 after extensive negotiations during a full day mediation with the experienced and well-respected
6 mediator Gig Kyriacou, Esq. Based upon the totality of circumstances, I believe that the result
7 achieved in this case is a good outcome for all class members.

8 5. Based on my experience as Class Counsel, and given the legal and factual
9 realities presented in this case, I believe the proposed settlement is fair, reasonable and adequate
10 for the class. As a result of my prior experience as class counsel in other class actions, I am
11 fully aware of the responsibilities I would owe as Class Counsel to the Class in this action.

12 6. Finally, I am not aware of any conflict of interest between myself and Plaintiff or
13 any other Class Member, on the other hand, which would interfere with my duties as Class Counsel
14 or impede my representation of the proposed Class.

15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct.

17 Executed on October 31, 2022 at Tarzana, California.

18 DocuSigned by:

19 *Sahag Majarian*

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21 Sahag Majarian II