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Attorneys for Rebecca De Benning, on behalf of herself
and all others similarly situated

SUPERIOR COURT OF CALIFORNIA**COUNTY OF SACRAMENTO**

REBECCA DE BENNING, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

COSTCO WHOLESALE CORPORATION,
a Washington Corporation; and Does 1
Through 10, Inclusive,

Defendants.

Case No. 34-2021-00309030

ASSIGNED FOR ALL PURPOSES TO: The
Honorable Jill H. Talley
Department 25

CLASS ACTION**DECLARATION OF SAHAG MAJARIAN
II IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: October 28, 2022

Time: 9:00 a.m.

Dept: 25

Judge: Honorable Jill H. Talley

Reservation: # 2667995

Complaint filed: September 30, 2021

Trial date: Not set

Declaration of Sahag Majarian II ISO Motion for Preliminary Approval of Class Action
Settlement - Case No. 34-2021-00309030

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 Rebecca De Benning in this action against Defendant Costco Wholesale Corporation. I
5 have personal 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. 06CC0148;
18 *DeLuna v. Target*, LASC Case No. BC353080; *Daglian v. Staples, Inc.*, LASC Case No.
19 BC375325; *McCoy v. Kimko*, OCSC Case No. 07CC00007; *Razo v. C & D Zodiac, Inc.*, OCSC
20 Case No. 07-CC01373; and *Gomez v. Spenuzza, Inc. et al*, RCSC Case No RIC524075.

21 3. In the employment class action arena, I have participated in over 300 class action
22 mediations. My participation has included extensive preparation, development of thorough
23 knowledge of the legal issues related to certification and liability, and full immersion and
24 participation in the mediation and negotiation process. I have also been designated co-class
25 counsel in various cases where we prevailed in contested class certification motions. These cases
26 include *Herrera v. Mountain Meadow Mushroom Farms, Inc.*, SDCSC Case No. 37-2009-
27 00092416-CU-MT-CTI; *Aguirre v. California Drop Forge, Inc.*, LASC Case No. BC374521; and
28 *Marroquin v. Swissport North America, Inc.*, LASC Case No. BC390001.

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

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

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

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

16 Executed on August 2, 2022 at Tarzana, California.

DocuSigned by:

Sahag Majarian

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Sahag Majarian II