

1 ZORIK MOORADIAN, Bar No. 136636

2 zorik@mooradianlaw.com

3 HAIK HACOPIAN, Bar No. 282361

4 haik@mooradianlaw.com

5 MOORADIAN LAW, APC

6 24007 Ventura Blvd., Suite 210

7 Calabasas, CA 91302

8 Telephone: (818) 487-1998

9 Facsimile: (888) 783-1030

10 Attorneys for Plaintiff Francisco Salazar, individually and on behalf of all other aggrieved
11 employees

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 FOR THE COUNTY OF LOS ANGELES – STANLEY MOSK COURTHOUSE

14 FRANCISCO SALAZAR, individually
15 and on behalf of all other aggrieved
16 employees,

17 Plaintiffs,

18 v.

19 STAFFMARK INVESTMENT LLC, an
20 active California Limited Liability
21 Company; and DOES 1 through 10,

22 Defendants.

Case No.: 21STCV39663

REPRESENTATIVE ACTION

*[Assigned to Hon. Randolph M. Hammock
in Dept. 49]*

**DECLARATION OF HAIK HACOPIAN
IN SUPPORT OF UNOPPOSED
MOTION FOR APPROVAL OF PAGA
SETTLEMENT, AND PAYMENT OF
ATTORNEYS' FEES AND COSTS,
ADMINISTRATION COSTS, AND
ENHANCEMENT AWARD**

[CONCURRENTLY SUBMITTED NOTICE
OF MOTION AND MOTION;
DECLARATION OF ZORIK
MOORADIAN; AND [PROPOSED]
ORDER]

Date: December 28, 2023

Time: 8:30 a.m.

Dept.: 49

RESERVATION ID: 619194368852

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26 DECLARATION OF HAIK HACOPIAN

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Laboratories/BC712857; Contreras Teo v. Golden State Foods/BC708535; Contreras Teo v. Golden State Foods/BC722540; Corona v. Del Amo Hospital/19STCV24741; Cruz Ventura v. WSON-55/19STCV22958; Galvan v. Property Mgt. Associates/BC722781; Gonzalez v. Toyon Catering, Inc./19STCV11369; Gonzalez v. FMS Mgt./30-2019-01065563; Gutierrez v. Anaheim Denn/30-2019-01092546; Ramos v. Liberty Container Corp./20STCV06560; Hernandez v. Resource Employment Solutions/30-2019-01084740; Leon v. Island Hospitality Mgt./30-2019-01060719; Mendoza v. Savage Service Corp./18STCV04798; Martinez v. Riviera Beverages/ 30-2019-01056796; Mendoza v. United Production Framing/30-2019-01104255; Morales Cano v. Coordinated Staffing/19STCV29817; Moreno v. DCX-CHOL Enterprises/19STCV19105; Moreno v. DCX-CHOL Enterprises/19STCV26247; Contoran Najera v. TOPH I, LLC/30-2018-00999474; Alvarez v. Greenfield Care Center of Fullerton/30-2017-00958478; Pallares - Mercado v. MB Santa Ana Restaurants/30-2019-01047135; Perez v. First Rate Staffing/18STCV02057; Popoca v. Denim Technologies/19STCV11434; Salceda v. GBG USA, Inc./ 18STCV10004; Salceda v. GBG USA, Inc./ 18STCV04778; Torres v. Metro Security/19STCV21114; Torres v. Metro Security/19STCV15680; Villacana v. Crothall Laundry Services, Inc./19STCV16330.

4. I am familiar with California wage and hour law including the laws governing the alleged violations and the Orders of the Industrial Welfare Commission, and the Private Attorneys General Act.

5. As a result of my prior experience in other wage and hour matters, including representative PAGA matters, I believe that the proposed settlement continues is fair and reasonable and more than adequate in view of (i) the strength of Plaintiff's claims and Defendant's defenses, (ii) the risk, expense, complexity and likely duration of further litigation, (iii) potential trial manageability issues, (iv) the total settlement amount of \$1,090,000.00 offered in settlement, (v) the risk of significant discretionary reduction of maximum penalties by a court even assuming liability was established for any violations; (vi) the discovery conducted by the Parties in this case, (vii) my experience with similar settlements that have received court approval, and (viii) the fact that the settlement involved

1 arms' length negotiations between experienced counsel facilitated by Mr. Jeffrey Krivis, a
2 respected neutral mediator.

3 6. A true and correct copy of my time and cost ledger for this matter is attached
4 hereto as **Exhibit "1"**. My standard billing rate is \$450 per hour. The attached time entries
5 represent at least 67.9 hours of work I have performed on this matter which brings my total
6 lodestar to \$30,555 (67.9 x \$450). As also reflected by the attached ledger, I have incurred
7 \$439.68 in costs.

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

10 Executed this 5th day of December 2023, in Calabasas, California.

11 /s/Haik Hacopian

12 Haik Hacopian, Declarant
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HAIK HACOPIAN - TIME AND COST LEDGER - SALAZAR v. YUSEN, STAFFMARK

MIN HRS

2021	5	10	Hours		50	0.83	Review initial intake and look into pending matters and potential defendants
2021	8	20	Hours		100	1.67	Assess re lawsuit, review client docs, research other pending lawsuits/settlements, determine proper party defendants, assess re claims to bring, and related research
2021	8	20	Hours		70	1.17	Prep PAGA Notice Letter - PAGA
2021	8	21	Costs	\$8.30		0.00	PAGA Notice Certified Mail x2 - PAGA
2021	8	21	Costs	\$75.00		0.00	LWDA PAGA Notice Fee - PAGA
2021	8	26	Hours		120	2.00	Prep class action complaint and case initiating pleadings - Class
2021	9	29	Hours		45	0.75	Conference w co-counsel re case and litigation strategy - Class/PAGA
2021	10	1	Hours		40	0.67	Review ct order re newly filed class action, assess file re service tasks, retrieve conformed ct docs and service of process orders, calendar hearing date, report filing DL and related reminders - Class
2021	10	5	Costs	\$41.18		0.00	OneLegal Service of Process Charges (Def. Staffmark Investment) - Class (21STCV31753)
2021	10	5	Costs	\$41.18		0.00	OneLegal Service of Process Charges (Def. Yusen) - Class (21STCV31753)
2021	10	27	Hours		35	0.58	Review Staffmark Ltr re arbitration, assess re enforceability of arb agreement, and related research - Class/PAGA
2021	10	27	Hours		60	1.00	Prep PAGA complaint and case initiating pleadings - PAGA
2021	10	27	Hours		10	0.17	Attn to Notice of Appearance filed by Staffmark - Class
2021	10	28	Hours		35	0.58	Further assessment of arb agreement enforceability, draft memo email and circulate
2021	10	28	Costs	\$29.51		0.00	OneLegal Complaint Filing charges - PAGA
2021	11	1	Hours		15	0.25	Emails re arb agreement review with client, review file
2021	11	3	Hours		10	0.17	Retrieve and index conformed PAGA complaint and upload to LWDA online - PAGA
2021	11	3	Hours		60	1.00	Ph Conference wClient re Produced arbitration agreement, review notes and draft memo to file, email to ZM re same - Class/PAGA
2021	11	3	Hours		10	0.17	Email to def counsel re arb agreement and 10/27 letter
2021	11	4	Hours		15	0.25	Review order setting CMC, calendar dates and reminders - PAGA
2021	11	10	Hours		210	3.50	Review removal papers, assess amt in controversy, explore remand options and alternate CAFA valuation, review ct's standing order and civil trial order, review Answer, review and update calendaring, draft email memo re removal assessmebnt and circulate - Class
2021	11	11	Hours		20	0.33	Prep service orders with OneLegal for PAGA lawsuit - PAGA
2021	11	12	Costs	\$41.18		0.00	OneLegal Service of Process Charges (Def. Yusen) - PAGA
2021	11	12	Costs	\$41.18		0.00	OneLegal Service of Process Charges (Def. Staffmark Investment) - PAGA
2021	11	16	Hours		10	0.17	Attn to StaffMark Answer and Notice of Interested Parties - Class
2021	11	18	Hours		25	0.42	Attn to StaffMark LR 7-3 meet and confer ltr re arb motion and review of authorities cited therein - Class

EXHIBIT "1":

2021	11	22	Hours		15	0.25	Review LASC Minute Order re Removed Action- calendar dates and deadlines - Class
2021	12	1	Hours		40	0.67	Zoom conference wStaffmark counsel re arbitration, review notes and draft summary memo - Class/PAGA
2021	12	1	Hours		30	0.50	Review order setting scheduling conference, calendar dates, and reminders, review ct website and orders re special requirements - Class
2021	12	1	Hours		15	0.25	Review Staffmark Answer, attn to stip to continue conference - class
2021	12	6	Hours		10	0.17	Attn to StaffMark Answer in PAGA action - PAGA
2021	12	13	Hours		15	0.25	Review and assess Staffmark ltr re Salazar employment issues - Class/PAGA
2021	12	13	Hours		70	1.17	Review and assess Yusen's Motion to Stay, Staffmark joinder, research re cited cases and addt'l authorities to support potential oppo - PAGA
2022	1	3	Hours		15	0.25	Review Local Rules and amendments thereto as relevant to case - class
2022	1	5	Hours		90	1.50	Review file and prep for meet and confer conference of counsel, email agenda and class/PAGA case summary to ZM incl. scheduling conference, stay issues, and potential mtn to compel arbitration - class/PAGA
2022	1	13	Hours		10	0.17	Attn to emails re class/PAGA size fr Staffmark - Class/PAGA
2022	1	19	Hours		25	0.42	Zoom meet and confer conference with counsel - Class/PAGA
2022	1	19	Hours		30	0.50	Prep stip to file FAC and circulate - PAGA
2022	1	19	Hours		45	0.75	Review file and prep draft tolling agreement and email to parties - PAGA
2022	1	20	Hours		45	0.75	Prep draft FAC and circulate to counse, make edits per counsel emails - PAGA
2022	1	21	Hours		15	0.25	Emails with counsel re finalizing docs - PAGA
2022	1	24	Hours		80	1.33	Prep init draft of scheduling conference and circulate, make edits per counsel emails, finalize and file - class
2022	1	24	Hours		20	0.33	Finalize stip and tolling agreement and circulate - PAGA
2022	1	24	Hours		15	0.25	Email to staff re tolling agreement for client - PAGA
2022	1	25	Costs	\$41.39		0.00	OneLegal Stip and Order Filing Charges - PAGA
2022	1	26	Hours		40	0.67	Prep and circulate stip to dismiss action, finalize and file - Class
2022	1	26	Hours		15	0.25	Finalize and file FAC - PAGA
2022	1	27	Costs	\$20.80		0.00	OneLegal Amended Complaint Filing Charges - PAGA
2022	2	28	Hours		10	0.17	Attn to StaffMark Answer to FAC - PAGA
2022	3	7	Hours		10	0.17	Attn to Yusen Answer to FAC - PAGA
2022	3	22	Hours		25	0.42	Draft and file CMC statement, review Defs' CMC statements - PAGA
2022	3	22	Costs	\$21.31		0.00	OneLegal CMC Statement Filing Charges - PAGA
2022	4	5	Hours		45	0.75	Appear for Init CMC - PAGA
2022	6	16	Hours		20	0.33	Review file and assess re case posture in light of Viking River decision, email re same - PAGA
2022	10	3	Hours		15	0.25	Review file and assess re mediation - PAGA
2022	10	28	Hours		15	0.25	Emails to staff re client inquiry re case status - PAGA
2023	5	9	Hours		75	1.25	Review file and prep informal discovery requests for mediation and email to def counsel - PAGA
2023	6	6	Hours		40	0.67	Review and assess informal discovery responses and prep for mediation, email response - PAGA

2023	6	13	Hours		10	0.17	Follow up email to def counsel re mediation informal discovery - PAGA
2023	7	7	Hours		360	6.00	Review mediation production re claims and damage assessment - PAGA
2023	7	8	Hours		270	4.50	Review mediation production re claims and damage assessment - PAGA
2023	7	9	Hours		120	2.00	Work on mediation brief and damage analysis - PAGA
2023	7	10	Hours		70	1.17	Work on mediation brief and finalize - PAGA
2023	7	12	Hours		120	2.00	Organize file, index docs for mediation, and further prep - PAGA
2023	7	13	Hours		480	8.00	Attend full-day mediation w/ Krivis and MOU work - PAGA
2023	7	25	Hours		10	0.17	Attn to email fr Staffmark re settlement approval - PAGA
2023	8	1	Hours		10	0.17	Review file and status and email to counsel re long-form agreement prep - PAGA
2023	8	14	Hours		30	0.50	Assess matter re vacating trial dates, notice of settlement, and long-form agreement draft, email to counsel - PAGA
2023	8	21	Hours		15	0.25	Review and approve stip re trial dates and settlement fr Staffmark counsel, email response - PAGA
2023	8	23	Hours		20	0.33	Review conformed order of ct and update case calendaring and related reminders - PAGA
2023	10	3	Hours		180	3.00	Prep draft long-form PAGA settlement agreement - PAGA
2023	10	4	Hours		15	0.25	Finalize draft long-form agreement and circulate to counsel - PAGA
2023	10	23	Hours		25	0.42	Review Staffmark edits to draft agreement and finalize - PAGA
2023	10	23	Hours		10	0.17	Email to CPT re admin quote for settlement - PAGA
2023	11	6	Hours		25	0.42	Prep draft PAGA settlement notice letter and circulate - PAGA
2023	11	8	Hours		15	0.25	Further work on settlement docs, email to counsel - PAGA
2023	11	15	Hours		20	0.33	Follow up with Staffmark counsel re review of settlement docs and ct reservation for approval motion - PAGA
2023	11	15	Costs	\$61.65		0.00	LASC Motion Reservation Charges (PAGA Settlement Approval) - PAGA
2023	11	17	Hours		15	0.25	Further work on finalizing settlement papers, emails to counsel - PAGA
2023	11	30	Hours		300	5.00	Prep PAGA approval motion - PAGA
2023	12	1	Hours		120	2.00	Further work on PAGA approval mtn, circulate draft to counsel, circulate final versions of settlement docs for signature - PAGA
2023	12	5	Costs	\$17.00		0.00	OneLegal PAGA Settlement Approval Motion Filing Fee - PAGA (est.)
				\$439.68	4075	67.92	