

1 Joseph Lavi, Esq. (SBN 209776)
2 Vincent C. Granberry, Esq. (SBN 276483)
3 Cassandra A. Castro, Esq. (SBN 334238)
4 **LAVI & EBRAHIMIAN, LLP**
5 8889 W. Olympic Blvd., Suite 200
6 Beverly Hills, California 90211
7 Telephone: (310) 432-0000
8 Facsimile: (310) 432-0001
9 Emails: jlavi@lelawfirm.com
10 vgranberry@lelawfirm.com
11 ccastro@lelawfirm.com

12 Attorneys for Plaintiff WINIFRED ALLISON,
13 on behalf of herself and others similarly situated

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15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

17 LAURA LOPEZ, as an individual and on behalf
18 of all others similarly situated,

19 Plaintiff,

20 vs.

21 BARLOW RESPIRATORY HOSPITAL, a
22 California corporation; and DOES 1 through
23 100,

24 Defendants.

Case No.: 22STCV03831
Lead Case No: 21STCV29754

CLASS ACTION

*[Assigned for all purposes to the Hon. Carolyn
B. Kuhl, Dept. S-12]*

**DECLARATION OF VINCENT C.
GRANBERRY IN SUPPORT OF
PLAINTIFF'S NOTICE OF MOTION
AND MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

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1. I am an attorney licensed to practice law in the state of California and have been admitted to practice before this Court. I am an attorney with the law firm Lavi & Ebrahimian, LLP, Counsel for Plaintiff Winifred Allison in this action, and I am an attorney assigned to work on this case. Based on my assignment to this case and familiarity with the file in this matter; I have personal knowledge of the matters stated herein and if called and sworn as a witness, I would and could competently testify under oath thereto. I am a member in good standing of all State and Federal Courts of California.

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are available to assist us in this case if needed are fully capable of adequately and fairly representing Plaintiff and the proposed class in this matter. Lavi & Ebrahimian, LLP, has been appointed Class Counsel in over fifty contested proceedings including the following:

a. *Ischak v. Kaiser Foundation Hospitals, Inc.*, Los Angeles Superior Court Case No. BC343535;

b. *Santana v. El Pollo Loco, Inc.*, Los Angeles Superior Court Case No. BC369846;

c. *Edlin, et al. v. Fuddruckers, Inc.*, United States District Court, Central District of California, Case No. CV-07-3678-ABC;

d. *Chavez, et al. vs. CEC Entertainment, Inc. d/b/a Chukee-Cheeses*, Los Angeles Superior Court Case No. BC380996;

e. *Bustamante, et al. v. Teamone Employment Specialists*, Los Angeles Superior Court Case No. BC383266;

f. *Cervantes, et al. v. Kaiser Foundation Hospitals, Inc.*, Alameda Superior Court Case No. RG 0265835;

g. *Seng Savang v. Club One Casino*; Fresno Superior Court Case No. 05CECG02189;

h. *Norman, et al. v. Movado Retail Group, Inc.*, United States District Court, Central District of California, Case No. CV08-06691 SVW (PLA)

i. *Shand v. G.A.L.A., Inc. dba Giorgio Armani*, Los Angeles Superior Court Case No. BC342588;

g. *Solis v. Plycraft Industries, Inc.*, Los Angeles Superior Court Case No. BC374816;

h. *Campos v. HWB Carwash, Inc.*, Los Angeles Superior Court Case No. BC378990;

i. *Acosta, et al. v. Texwood Industries*, United States District Court, Central District of California, Case No. CV07-3237-DDP (PLAX);

1 h. *Arevalo v. Gruma Corporation*, Los Angeles Superior Court Case No.
2 BC410322;
3 j. *Burrola v. American Promotional Events*, Los Angeles Superior Court Case
4 No. BC412315;
5 k. *Cortez v. Trader Distribution Services*, Los Angeles Superior Court Case No.
6 BC397208;
7 l. *Cueva v. Allied Industries, Inc.*, Los Angeles Superior Court Case No.
8 BC399431;
9 m. *Del Toro v. Petco Animal Supplies, Inc.*, San Diego Superior Court Case No.
10 37-2009-00103626-CU-OE-CTL;
11 n. *Garcia v. Home Cooking, Inc.*, Los Angeles Superior Court Case No.
12 BC451148;
13 o. *Alcantar v. Amerimax Building Products, Inc.*, United States District Court,
14 Central District of California, Case No. CV 10-8916 DDP (CWx);
15 p. *Arancivias v. Clougherty Packaging, LLC dba Farmer John*, Los Angeles
16 Superior Court Case No. BC432406;
17 q. *Barajas v. Menzies Aviation, Inc.*, United States District Court, Central
18 District of California, Case No CV-10-02315-JEM;
19 r. *Barrera v. BHFC Operating, LLC dba Bottega Louie*, Los Angeles Superior
20 Court Case No. BC462603;
21 s. *Camacho v. American Textile Maintenance Co.*, Los Angeles Superior
22 Court Case No. BC452570;
23 t. *Cortes v. Monsanto Company*, Ventura Superior Court Case No. 56-2010-
24 00366952-CU-OE-VTA;
25 u. *Escobar v. Aero-Electric Connector, Inc.*, Los Angeles Superior Court Case
26 No. BC421009;
27 v. *Gomez v. Bacara Resort & Spa*, Santa Barbara Superior Court Case No.

1 1341987;

2 w. *Gonzalez v. Ashley Furniture Industries, Inc.*, Los Angeles Superior Court
3 Case No. BC425708;

4 x. *Gonzalez v. Burrtec Waste Industries, Inc.*, Los Angeles Superior Court Case
5 No. BC436879;

6 y. *Gutierrez v. Visterra Credit Union*, Riverside Superior Court Case No.
7 RIC10020183;

8 z. *Hernandez v. Kruse & Son, Inc.*, Los Angeles Superior Court Case No.
9 BC411849;

10 aa. *Lopez v. Tecno Industrial Engineering*, Los Angeles Superior Court Case No.
11 BC411134;

12 bb. *Lowanga v. Continental Currency Services, Inc.*, Orange County Superior
13 Court Case No. 30-2011-0044011-CU-OE-CXC;

14 cc. *Aguilar v. PLS Financial Services, Inc.*, United States District Court, Central
15 District of California, Case No. CV 10-0415 ODW (FMOx);

16 dd. *Lozada v. Classic Party Rentals, Inc.*, Los Angeles Superior Court Case No.
17 BC443792;

18 ee. *Madrid v. OPI Products, Inc.*, Los Angeles Superior Court Case No.
19 BC451489;

20 ff. *Martinez v. J. Fletcher Creamer & Son, Inc.*, United States District Court
21 Case No. CV 10-0968-PSG-FMOX;

22 gg. *Martinez v. Administaff Companies II, L.P.*, Los Angeles Superior Court Case
23 No. BC425799;

24 hh. *Martinez v. Morgans Hotel Group Management, LLC*, Los Angeles Superior
25 Court Case No. BC446744;

26 jj. *Sanchez v. La Brea Bakery, Inc.*, Los Angeles Superior Court Case No.
27 BC456420;

1 ii. *Montenegro v. Ruggeri Marble and Granite, Inc.*, United States District
2 Court, Central District of California, Case No. CV-10-00711 JFW (PLAx);
3 kk. *Reed v. 99 Cents Only Stores*, Los Angeles Superior Court Case No.
4 BC436793;
5 ll. *Santos v. Noble Management Group-California, LLC*, United States District
6 Court, Central District of California, Case No. CV 10-2594 DSF (VBKx)
7 mm. *Taylor v. U.S. Healthworks Holding Company, Inc.*, Orange County Superior
8 Court Case No. 30-2011-00473505;
9 nn. *Valencia Diaz v. Gene Wheeler Farms, Inc.*, Los Angeles Superior Court
10 Case No. BC436235;
11 oo. *Zad-Behtooie v. Valley Village*, Los Angeles Superior Court Case No.
12 BC451490;
13 pp. *Bell v. Aidells Sausage Company, Inc.*, Alameda Superior Court Case No.
14 RG10523946;
15 qq. *Negrete v. Cenveo, Inc.*, United States District Court, Central District of
16 California, Case No. CV 11-09543 DSF (MRWx);
17 rr. *Bejar v. Exopack-Ontario, Inc.*, Orange County Superior Court Case No. 30-
18 2011-00518396-CU-OE-CXC;
19 ss. *Aguilar v. PLS Financial Services, Inc.*, United States District Court, Central
20 District of California, Case No. CV 10-0415 ODW (FMOx);
21 tt. *Sparks v. Larry Flynt dba Hustler Casino*, Los Angeles Superior Court Case
22 No. BC320172;
23 uu. *Morris v. Chevron Stations, Inc.*, Los Angeles Superior Court Case No.
24 BC361380;
25 vv. *Marino v. BP West Coast Products, LLC*, Los Angeles Superior Court Case
26 No. BC357987.
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1 4. I graduated from Sandra Day O'Connor College of Law at Arizona State University
2 in 2010. I have been in practice since 2011 and with the law firm of Lavi & Ebrahimi, LLP since
3 April 2014, focusing almost exclusively in the area of employment law. Over the last nine years, my
4 practice has focused nearly exclusively on wage and hour class action litigation with a handful of
5 consumer class actions. I was selected by Super Lawyers Magazine as a Southern California Rising
6 Star in 2016 through 2023 and as a Super Lawyers Rising Star Up-And-Coming 100 in my field in
7 2018, 2020, 2021, 2022, and 2023.

8 5. Cassandra Castro, an associate of Lavi & Ebrahimi who performed work on this
9 case, graduated from Boston University School of Law in 2020. Ms. Castro has been in practice
10 since 2021 and with the law firm of Lavi & Ebrahimi, LLP since August 2023.

11 6. The specific work performed by my firm in prosecuting this action has included, but
12 not been limited to: preparing the pleadings, extensive informal discovery exchange which included
13 the calculation of the total number of workweeks and pay periods worked by class members and
14 aggrieved employees, as well as information regarding number of current and former employees;
15 and Plaintiff's counsel's analysis of both the aforementioned data as and Defendant's relevant
16 policies and procedures and employee handbooks; and developing the strategy for prosecuting the
17 claims in this case; reviewing documents; analyzing the data; participating in settlement
18 negotiations; participating in a full-day mediation; negotiating, drafting, and reviewing the
19 Stipulation of Settlement.

20 7. Our firm maintains all records regarding costs expended on each case. I have
21 reviewed the records of costs expended in this matter. According to our records, our firm has
22 incurred approximately \$6,000.00 in costs in this matter at this time and will likely incur additional
23 costs to see this matter through final judgment. This amount includes costs associated with the costs
24 associated with filing of the papers filed and responded to in this matter, service of process for the
25 summons and complaint, mediation fees, and future filings and document preparation as they
26 become necessary in this matter.

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**CONTRIBUTION OF PLAINTIFF AND REASONABLENESS OF THE REQUESTED
ENHANCEMENT PAYMENT:**

8. It is imperative that Plaintiff obtain just compensation for the time, effort and risk associated with her fiduciary duties as a class representative and named Plaintiff. I believe that the named Plaintiff performed considerable services on behalf of the Settlement Class during the last 30 months, since she first searched for an attorney, collected and gathered the requested documents and information, wage statements and/or pay stubs, met with us, made herself available each and every single time that an attorney at my firm called about Defendant's policies and procedures produced in informal discovery or discussed during conversations with opposing counsel or raised in pleadings filed in this matter. The named Plaintiff provided Class Counsel with factual information needed to prepare the complaints. She collected relevant documents and produced those documents to Class Counsel. She continued to be engaged in settlement negotiations that were ultimately required to reach a settlement in this case. Further, she does not have any interest that is adverse to the interests of the other class members. I believe that the service fee request of \$7,500 to Plaintiff as an incentive payment as well as for providing a general release of her claims is fair and reasonable, and such payment will not be opposed by Defendant. As such, the requested payment is warranted for her time and effort when the class members are able to receive significant benefits for her efforts, as well as the fact that she put herself at significant risk for liability for costs in this matter if Defendant was the prevailing party in the litigation, as well as for retaliation by other employers who may discover and find it to be unappealing that she was a class representative in a lawsuit against Defendant, her former employer. At this point in the approval process, Plaintiff's requested payment should be approved in order to allow the Class Members an opportunity to object to the requested enhancement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 16th day of May, at Beverly Hills California.

/s/ Vincent C. Granberry
Vincent C. Granberry