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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

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

Plaintiff,

vs.

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

Defendants.

Case No.: 21STCV29754 (Related to Case
Nos. 22STCV03831; 22STCV34472)

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

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

Dept.: 12

Action Filed: August 12, 2021
Trial Date: None Set

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DECLARATION OF SAHAG MAJARIAN II

I, SAHAG MAJARIAN II, hereby declare:

1. I am an attorney duly licensed to practice in the State of California and am the principle of Law Offices of Sahag Majarian II counsel to Plaintiff Laura Lopez in this action against Defendant. I have personal knowledge of the following, and if called and sworn as a witness, I could and would competently testify thereto. This declaration is made in support of preliminary approval of the class action settlement in this case.

2. I graduated from Loyola Law School in 1990. Since my graduation, I have been in private practice primarily representing consumers against insurance companies and workers against their employers. I have devoted a significant portion of my practice to employment law and class actions, and have been appointed co-class counsel for the plaintiffs in no less than 300 wage and hour class actions. A sample of these cases are: *Ayvazi v. Ralph Grocery Company*, LASC Case No. BC 382980; *Sandoval vs. Chevron Stations, Inc.*, MCSC Case No. CV061690; *Nieves v. Roy's Worldwide, Inc.*, OCSC Case No. 06CC0076; *Corado v. Good Year Rubber Corp.*, SBSC Case No. RCV095476; *Pleitez v. Johnson Controls*, LASC Case No. BC353315; *Serrano v. BC/ Coca Cola Bottling Co. of L.A.*, LASC Case No. BC349904; *Urbina v. Valley Crest Co.*, LASC Case No. BC356023; *Moraza v. OK International*, OCSC Case No. 06CC0148; *Deluna v. Target*, LASC Case No. BC353080; *Daglian v. Staples, Inc.*, LASC Case No. BC375325; *McCoy v. Kimko*, OCSC Case No. 07CC00007; *Ayvazi v. Ralphs Grocery Company*, LASC Case No. BC382980; *Razo v. C & D Zodiac, Inc.*, OCSC Case No 07-CC01373; *Sandoval v. Chevron Stations, Inc.* MCSC Case No. CV061690; and *Gomez v. Spenuzza, Inc. et al*, RCSC Case No RIC524075.

3. In the employment class action arena, I have participated in over 300 class action mediations. My participation has included extensive preparation, development of thorough knowledge of the legal issues related to certification and liability, and full immersion and participation in the mediation and negotiation process. I have also been designated co-class counsel in various cases where we prevailed in contested class certification motions. These cases

1 include *Herrera v. Mountain Meadow Mushroom Farms, Inc.*, SDCSC Case No. 37-2009-
2 00092416- CU-MT-CTI; *Aguirre v. California Drop Forge, Inc.*, LASC Case No. BC374521;
3 *Marroquin v. Swissport North America, Inc.*, LASC Case No. BC390001; and *Romero v.*
4 *Hydraulics International, Inc.*, LASC Case No. 19STCV04463.

5 4. Throughout my thirty-four-year career in law, my practice has been exclusively
6 contingent fee work. Within the class action arena, I have been designated co-class counsel in no
7 less than 30 class actions that have settled for over \$1 million each.

8 5. My firm's involvement in this case has included legal research, investigation,
9 extensive preparation, development of a thorough knowledge of the legal issues related to
10 certification and liability, and full immersion and preparation for the mediation against
11 Defendants. The settlement in this case was reached after extensive negotiations for numerous
12 months following an initial unsuccessful mediation with an experienced and well-respected
13 mediator Jeff Ross.

14 6. Based on my experience as Class counsel in other employment cases and given
15 the legal and factual realities presented in this case, I believe the proposed settlement is fair,
16 reasonable and adequate for the class and the aggrieved employees.

17 7. I do not have any conflict with any of the parties involved in this action and I am
18 ready to expend the financial resources and personal time leading to the ultimate conclusion of
19 this case.

20 I declare under the penalty of perjury under the laws of the State of California the foregoing
21 is true and correct and this declaration is executed May 23, 2024, in Tarzana, California.

22 DocuSigned by:
23 *Sahag Majarian*
24 3142D9828E6E4A2...

25 SAHAG MAJARIAN II
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