

BIBIYAN LAW GROUP, P.C.

David D. Bibiyan (SBN 287811)

david@tomorrowlaw.com

Vedang J. Patel (SBN 328647)

vedang@tomorrowlaw.com

1460 Westwood Boulevard

Los Angeles, California 90024

Tel: (310) 438-5555; Fax: (310) 300-1705

Attorneys for Plaintiffs

on behalf of themselves and all others similarly situated and aggrieved

[Additional Counsel on Next Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF KINGS

ADALBERTO PEREZ, JOSEPH MITCHELL,
JULIO A. VASQUEZ, ALFREDO RIVERA,
an individual and on behalf of all others
similarly situated,

Plaintiff,

v.

HOLLANDIA FARMS, INC., a California
corporation; HOLLANDIA FARMS NORTH,
INC., a California corporation; HOLLANDIA
DAIRY, INC., a California corporation; and
DOES 1 through 100, inclusive,

Defendants.

CASE NO.: 22C-0302

[Assigned to the Hon. Robert S. Burns in Dept.
2]

**DECLARATION OF DAVID D. BIBIYAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND REPRESENTATIVE
ACTION SETTLEMENT AND
PROVISIONAL CLASS
CERTIFICATION FOR SETTLEMENT
PURPOSES ONLY**

J. GILL LAW GROUP, P.C.

Jasmin K. Gill, Esq. (Cal Bar No. 315090)
Ashlie E. Fox, Esq. (Cal. Bar No. 294407)
Sacha Pomares, Esq. (Cal Bar No. 337642)
515 South Flower Street, Suite 1800
Los Angeles, California 90071
Tel: (310) 728-2137; Fax: (310) 728-2137

D.LAW, INC.

Emil Davtyan (SBN 299363)
emil@d.law
Roman Shkodnik (SBN 285152)
r.shkodnik@d.law
Enoch J. Kim (SBN 261146)
e.kim@d.law
Emma Geesaman (SBN 352715)
e.geesaman@d.law
Norayr Zakaryan (SBN 356913)
n.zakaryan@d.law
450 N. Brand Blvd, Suite 840
Glendale, CA 91203
Tel: (818) 962-6465; Fax: (818) 962-6469

DAVID YEREMIAN & ASSOCIATES, INC.

David Yeremian (SBN 226337)
david@yeremianlaw.com
450 N. Brand Blvd., Suite 840
Glendale, CA 91203
Tel: (818) 962-6465; Fax: (818) 962-6469

Attorneys for Plaintiffs, on behalf of themselves and
all others similarly situated and aggrieved

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

8
9
0
1
2
3
4
5
6
7
8

3
4
5
6
7
8

8

1 contributed to the legal education curriculum for attorneys practicing within it, I am also a
2 published author in the Daily Journal as a contributor in the Wage and Hour and PAGA context,
3 including, in December 15, an article entitled: “PAGA: What’s Gone, What’s Left and What’s
4 Next.” I have also been a quoted source in multiple other publications, including in article
5 published by Bloomberg Law dated November 1, 2023 entitled: “Adidas, Home Depot Sued in
6 Test Cases on Job Ad Pay Transparency.”

7 9. My firm has the experience, resources and means necessary to allow us to provide
8 adequate representation as Class Counsel to all Class Members in this litigation.

9 10. I have filed contested motions for class certification in the past and have been
10 appointed Class Counsel by the Superior Court of California in the past. Some examples of
11 Actions in which I was appointed Class Counsel include:

12 • *Santoyo v. Consolidated Foundries, Inc.*, Case No. BC612298, California Superior
13 Court, County of Los Angeles, Honorable Judge Ann I. Jones, presiding;

14 • *Arendorff v. Stanley Steamer International, Inc.*, Case No. BC681368, California
15 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos, presiding;

16 • *Barreto v. Don Roberto Jewelers, Inc.*, Case No. BC495451, California Superior Court,
17 County of Los Angeles, Honorable Ann I. Jones, presiding;

18 • *Junior Amilcar Laguna Gonzalez v. Takaaki Koyama*, Case No. BC641998, Los Angeles
19 Superior Court, Honorable Elihu M. Berle, presiding;

20 • *Rios v. Nongshim America, Inc.*, Case No. CIVDS1807390, California Superior Court,
21 County of San Bernardino, Honorable David S. Cohn, presiding;

22 • *Stoddard v. Molded Fiber Glass – West*, Case No. 1517758, California Superior Court,
23 County of San Bernardino, Honorable David S. Cohn, presiding;

24 • *Mata v. Sahara Scaffold, Inc.*, Case No. CIVDS1810785, California Superior Court,
25 County of San Bernardino, Honorable David S. Cohn, presiding;

26 • *Carrasco v. Pure Dental Solutions*, Case No. BC645995, Los Angeles Superior Court,
27 Honorable Kenneth R. Freeman, presiding;

28 • *Gonzalez v. Gochez, et al.*, Case No. BC648729, Los Angeles Superior Court, Honorable

1 Maren Nelson, presiding;
2 • *Montoya v. Superior Paving Co.*, Case No. CIVDS1833422, County of San Bernardino,
3 Honorable David S. Cohn, presiding;
4 • *Lopez v. Norred & Associates, Inc.*, Case No. CIVDS1824109, California Superior
5 Court, County of San Bernardino, David S. Cohn, presiding;
6 • *Noyola v. Lacren, LLC*, Case No. BC717024, California Superior Court, County of Los
7 Angeles, Hon. Anthony Mohr, presiding;
8 • *Luciano, et al. v. O'Tasty Foods, Inc., et al.*, Case No. BC711988, California Superior
9 Court, County of Los Angeles, Honorable Maren Nelson, presiding;
10 • *Gordon v. Hospice Source, LLC*, Case No. 34-2018-00250022-CU-OE-GDS, California
11 Superior Court, County of Sacramento, Honorable Christopher E. Krueger, presiding;
12 • *Barragan v. Refrigeration Supplies Distributor*, Case No. 19STCV09312, California
13 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;
14 • *Ramirez v. Acre Gourmet, Inc.*, Case No. CGC-19-575117, California Superior Court,
15 County of San Francisco, Honorable Andrew Y.S. Cheng, presiding;
16 • *Villafuerte v. Bay Alarm Company*, Case No. BC689110, California Superior Court,
17 County of Los Angeles, Honorable Amy D. Hogue, presiding;
18 • *Cazares v. Areas USA LAX, LLC*, Case No. 19STCV08209, California Superior Court,
19 County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;
20 • *Magana v. Castlerock Environmental, Inc., et al.*, Case No. 19STCV38353, California
21 Superior Court, County of Los Angeles, Honorable Ann I. Jones, presiding;
22 • *Chilel v. Sushi California, Inc.*, Case No. 19STCV08209, California Superior Court,
23 County of Los Angeles, Honorable Ann I. Jones, presiding;
24 • *Malone v. Orange Courier, Inc., et al.*, Case No. 30-2016-00763474, California Superior
25 Court, County of Orange, Honorable Glenda Sanders, presiding;
26 • *Rivera v. Talamo Food Services, Inc.*, Case No. 19CV355856, California Superior Court,
27 County of Santa Clara, Honorable Patricia M. Lucas, presiding;
28 • *Olguin v. Cal Central Harvesting, Inc.*, Case No. 18CV03860, California Superior Court,

1 County of Santa Barbara, Honorable James F. Rigali, presiding;
2 • *Pence v. Sober Living by the Sea, Inc.*, Case No. 2018-00988742, California Superior
3 Court, County of Orange, Honorable Randall J. Sherman, presiding;
4 • *Franco v. Vincent Rags, Inc.*, Case No. 20STCV07768, California Superior Court,
5 County of Los Angeles, Honorable Ann I. Jones, presiding;
6 • *Cabral v. Miller Castings, Inc.*, Case No. 19STCV39556, California Superior Court,
7 County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;
8 • *Bolanos v. Texas Roadhouse, Inc.*, Case No. 19STCV39556, California Superior Court,
9 County of Los Angeles, Honorable Sunshine Sykes, presiding;
10 • *Rodriguez v. Scott A. Humphreys, Inc.*, Case No. 30-2021-01184556-CU-OE-CXC,
11 California Superior Court, County of Ventura, Honorable Matthew P. Guasco, presiding;
12 • *Torres v. Primal Pet Foods, Inc.* Case No. FCS054783, California Superior Court,
13 County of Solano, Honorable Wendy G. Getty, presiding;
14 • *Hanson v. Zapata Nuccio, Inc.*, Case No. 20STCV28951, California Superior Court,
15 County of Los Angeles, Honorable Elihu M. Berle, presiding;
16 • *Molina v. Avibank Mfg, Inc.*, Case No. 20STCV03910, California Superior Court,
17 County of Los Angeles, Honorable John P. Doyle, presiding;
18 • *Cetina v. Lawry's Restaurants, Inc.*, Case No. 19STCV05201, California Superior Court,
19 County of Los Angeles, Honorable Amy D. Hogue, presiding;
20 • *Luna v. Pronto California General Agency, LLC*, Case No. 19STCV39951, California
21 Superior Court, County of Los Angeles, Honorable Elihu M. Berle, presiding;
22 • *Alvarez v. Kazak-Mars, Inc.*, Case No. 20STCV42587, California Superior Court,
23 County of Los Angeles, Honorable Elihu M. Berle, presiding;
24 • *Noe v. My Pillow, Inc.* Case No. CIVDS 2011360, California Superior Court, County of
25 San Bernardino, Honorable David Cohn, presiding;
26 • *Nunez v. 2751 West Coast Acquisition Company*, Case No. 30-2020-01145215-CU-
27 OE-CXC, California Superior Court, County, County of Orange, Honorable Randall J. Sherman,
28 Presiding;

1 ///

2 • *Smith v. McMillen Enterprises, Inc.*, Case No. CV-20-002938, California Superior Court,
3 County of Stanislaus, Honorable John R. Mayne, presiding;

4 • *Turner v. Plant Prefab Inc., et al.*, Case No. CIVDS2017517, California Superior Court,
5 County of San Bernardino, Honorable David Cohn, presiding;

6 • *Duran v. Fresh Select, LLC*, Case No. VCU284892, California Superior Court, County
7 of Tulare, Honorable Bret Hillman, presiding;

8 • *Reynoso, et al. v. Cream of the Crop AG Service, Inc.*, Case No. VCU278847, California
9 Superior Court, County of Tulare, Honorable Bret Hillman, presiding;

10 • *Michel v. Universal Waste Systems, Inc.*, Case No. 19STCV46181, California Superior
11 Court, County of Los Angeles, Honorable David S. Cunningham presiding;

12 • *Jungers v. U.S. Borax Inc., et al.*, Case No. BCV-21-10003, California Superior Court,
13 County of Kern, Honorable Bernard C. Barmann Jr. presiding;

14 • *Fortune v. Amoroso Limited Partnership, et al.*, Case No. 20STCV25874, California
15 Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;

16 • *Montoya, et al. v. Remo, Inc.* Case No. 20STCV34614, California Superior Court,
17 County of Los Angeles, Honorable Maren Nelson presiding;

18 • *Rincon, et al. v. New-Indy Tripaq, LLC, et al.* Case No. 20STCV17118, California
19 Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;

20 • *De Leon, et al. v. Wismettac Asian Foods, Inc.* Case No. 19STCV18172, California
21 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;

22 • *Tapia v. Mercer Foods, Inc.* Case No. CV-21-000020, California Superior Court,
23 County of Stanislaus, Honorable Sonny S. Sandhu presiding;

24 • *Molina v. Reser's Fine Foods, Inc.* Case No. 37-2021-00013052-CU-OECTL, California
25 Superior Court, County of San Diego, Honorable Eddie C. Sturgeon presiding;

26 • *Reyes v. Imperial Sprinkler Supply, Inc.* Case No. 30-2020-01167748-CU-OE-CXC,
27 California Superior Court, County of Los Angeles, Honorable Peter Wilson presiding;

28 • *Zavala, et al. v. PLS Check Cashers, Inc.* Case No. 20STCV42586, California Superior

1 Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
2 • *Paz v. Hill Brothers Chemical Company*. Case No. 20STCV48279, California Superior
3 Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
4 • *Garcia v. Inwesco Incorporated*. Case No. 20STCV46833, California Superior Court,
5 County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
6 • *Guevara v. J&K Culver, LLC, et al.*. Case No. 19STCV39951, California Superior Court,
7 County of Los Angeles, Honorable Elihu M. Berle presiding;
8 • *Hamilton v. Michael Kors Stores, Inc. et al.*, Case No. 19STCV37061, California
9 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;
10 • *Arzooian v. A&M Administration, LLC, et al.* Case No. 21STCV05576, California
11 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;
12 • *Santos, et al. v. Maruzen of America, Inc.*, Case No. 19STCV37662, California Superior
13 Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;
14 • *Schaffino v. M.O. Dion & Sons., Inc., et al.*, Case No. 20STCV38023, California Superior
15 Court, County of Los Angeles, Honorable Gail Killefer presiding;
16 • *Moreno v. Santa Paula Post Acute, LLC, et al.* Case No. 21STCV12533, California
17 Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;
18 • *Singer v. Desert Area Resources and Training*, Case No. BCV-21-101093, California
19 Superior Court, County of Kern, Honorable Thomas S. Clark presiding;
20 • *Clarizio v. Guard-Systems, Inc.*, Case No. 21STCV28667, California Superior Court,
21 County of Los Angeles, Honorable Armen Tamzarian presiding;
22 • *Guzman v. Freschco Painters, Inc.*, Case No. 21STCV04683, California Superior Court,
23 County of Los Angeles, Honorable Lawrence P. Riff presiding;
24 • *Koutny v. PAE Aviation and Technical Services, LLC*, Case No. 21C-0106, California
25 Superior Court, County of Kings, Honorable Melissa R. D’Morias presiding;
26 • *Rodriguez v. Pacifica Trucks, LLC*, Case No. 20STCV37576, California Superior Court,
27 County of Los Angeles, Honorable Stuart Rice presiding;
28 • *Ramos v. AEGIS Treatment Centers, LLC*, Case No. 20STCV41429, California Superior

1 Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
2 • *Valdez v. Integrated Building Services, Inc.* Case No. 20STCV37793, California Superior
3 Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
4 • *Harris v. America One Security, Inc.* Case No. 21STCV01399, California Superior Court,
5 County of Los Angeles, Honorable Lawrence P. Riff presiding;
6 • *Moreno v. M&J Seafood Company, Inc.* Case No. 22STCV03341, California Superior
7 Court, County of Los Angeles, Honorable William F. Highberger presiding;
8 • *Corrales v. Q&B Foods, Inc.* Case No. 20STCV40885, California Superior Court,
9 County of Los Angeles, Honorable Elihu Berle presiding;
10 • *Arteaga v. Demolition Specialist, Inc.* Case No. RIC2001133, California Superior Court,
11 County of Riverside, Honorable Harold Hopp presiding;
12 • *Vigil, et al. v. Capstone Turbine Corporation*, Case No. 20STCV32123, California
13 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
14 • *Ramirez v. Sea-Win, Inc.* Case No. 21STCV22026, California Superior Court, County of
15 Los Angeles, Honorable Lawrence P. Riff presiding;
16 • *Ortega Chavez v. Winpak Lane, Inc.* Case No. CIVSB2207313, California Superior
17 Court, County of San Bernardino, Honorable Jessica Morgan presiding;
18 • *Garcia v. American Licorice Company*. Case No. RG21107049, California Superior
19 Court, County of Alameda, Honorable Brad Seligman presiding;
20 • *Madrono v. Vitale Nursing, Inc, et al.*, Case No. 21STCV09845, California Superior
21 Court, County of Los Angeles, Honorable Lawrence P. Riff presiding; and
22 • *Orellana v. Advanced Building Maintenance*. Case No. 34-2020-00286791-CU-OE-
23 GDS, California Superior Court, County of Sacramento, Honorable Jill Talley presiding.
24 • *Aguilar v. Bioness, Inc., et al.*, Case No. 21STCV41702, California Superior Court,
25 County of Los Angeles, Honorable Lawrence P. Riff presiding;
26 • *Antoine v. Pinky Beverly Hills, LLC., et al.* Case No. 19STCV44856, California
27 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
28 • *Bailey v. Cannon Constructors, Inc., et al.* Case No. 21STCV38274, California

1 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
2 • *Phambui v. Fashion Marketing and Merchandising Group, Inc., et al. Case No.*
3 *21STCV06634*, Superior Court, County of Los Angeles, Honorable Stuart M. Rice presiding;
4 • *Ortega Chavez v. Winpak Lane, Inc., et al. Case No. CIVSB2202274*, California
5 Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;
6 • *Carrasco v O.H. Barkhordar D.D.S., Inc., et al. Case No. 22STCV21188*, California
7 Superior Court, County of Los Angeles, Honorable Lawrence Riff presiding;
8 • *Correia v. Gallo Glass Company, et al. Case No. CV-21-006459*, California Superior
9 Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;
10 • *Davis v. Beeline Import and Services, LLC, et al. Case No. CIVSB2119287*, California
11 Superior Court, County of San Bernardino, Honorable David Cohn presiding;
12 • *Angel Lopez v Innovative Coatings Technology Corporation dba Incotec, et al. Case No.*
13 *30-2020-01173245-CU-OE-CXC*, California Superior Court, County of Orange, Honorable Lon
14 Hurwitz presiding;
15 • *Lopez v UPM, Inc., et al. Case No. 20STCV36695*, California Superior Court, County of
16 Los Angeles, Honorable Lawrence P. Riff presiding;
17 • *Moreno v. Infiniti Group LLC., et al. Case No. CIVSB2223551*, California Superior
18 Court, County of San Bernardino, Honorable Joseph T. Ortiz presiding;
19 • *Kelley v. Applus Technologies, Inc., et al. Case No. CIVSB2204889*, California Superior
20 Court, County of San Bernardino, honorable Jessica Morgan presiding;
21 • *Hernandez v Bromley Foods, Inc., et al. Case No. 56-2021-00561326-CU-OE-VTA*,
22 California Superior Court, County of Ventura, Honorable Henr Walsh presiding;
23 • *Heredia v. Alan Smith Pool Plastering, Inc., et al. Case No. 30-2020-01163609-CU-OE-*
24 *CXC*, California Superior Court, County of Orange, Honorable Randall J. Sherman presiding;
25 • *Martinez Guzman v Freshco Painters Inc., et al. Case No. 21STCV04683*, California
26 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
27 • *Gonzalez v. Total Education Solutions, Inc., et al. Case No. 20STCV37984*, California
28 Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;

1 ///

2 • *Gomez Mireles v. USG Ceilings Plus, LLC., et al. Case No. 21STCV45606*, California
3 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;

4 • *Garzon v. Mobile Hi-Tech Wheels, LLC., et al., Case No. 21STCV15396*, California
5 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;

6 • *Dethrasavong v. ASI Computer Technologies, Inc., et al. Case No. 20STCV32312*,
7 California Superior Court, County of Contra Costa, Honorable Kenneth R. Freeman presiding;

8 • *Iraheta v. Legacy Farmers, Inc.*, Case No. MSC21-00762, California Superior Court,
9 County of Contra Costa, Honorable Edward G. Weil presiding;

10 • *Echegoyen v. The ADT Security Corporation.*, Case No. 21STCV07206, California
11 Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding; and

12 • *Tarin v. TPS Solutions, Inc.*, Case No. 21STCV07844, California Superior Court,
13 County of Los Angeles, Honorable Maren E. Nelson presiding;

14 11. I have also settled matters on a “PAGA Only” basis for aggrieved employees in the
15 past, including in:

16 • *Flores v. Delta Apparel, Inc.*, Case No. BC641499, California Superior Court, County
17 of Los Angeles, Honorable Daniel J. Buckley, presiding;

18 • *Segura v. CJ Foods Service Holdings USA, LLC*, Case No. 19STCV24918, California
19 Superior Court, County of Los Angeles, Honorable Maureen Duffy-Lewis, presiding;

20 • *Sierra v. Nexem-Allied, LLC*, Case No. 20STCV11281, California Superior Court,
21 County of Los Angeles, Honorable Randolph M. Hammock, presiding;

22 • *Nodal v. Sodexo, Inc.*, Case No. 20STCV40601, California Superior Court, County of
23 Los Angeles, Honorable Lawrence Riff, presiding;

24 • *Cooper v. Lucas Health Partners*, Case No. 20STCV20050, California Superior Court,
25 County of Los Angeles, Honorable Maren Nelson, presiding;

26 • *Herrera v. Greystar Management, LP, et al.*, Case No. 37-2020-00009672-CU-OE-CTL,
27 California Superior Court, County of San Diego, Honorable Carolyn Caietti, presiding;

28 • *Slater v. Jo-Ann Stores, LLC.*, Case No. 21STCV18454, California Superior Court,

1 County of Los Angeles, Honorable Maurice A. Leiter, presiding;

2 • *Bolanos v. Canoga Park Heating & Air Conditioning, Co., Inc.*, Case No.

3 21STCV12674, California Superior Court, County of Los Angeles, Honorable Yolanda Orozco,

4 presiding;

5 • *Granados v. Cosmetic Ideas, Inc.* Case No. 21STCV10797, California Superior Court,

6 County of Los Angeles, Honorable Richard L. Fruin, presiding;

7 • *Ruano v. DPC Woodwork, Inc.* Case No. 21STCV00408, California Superior Court,

8 County of Los Angeles, Honorable Jon R. Takasugi presiding;

9 • *Tarin v. TPS Solutions, Inc.*, Case No. 21STCV07844, California Superior Court,

10 County of Los Angeles, Honorable Maren E. Nelson presiding;

11 • *Echegoyen v. The ADT Security Corporation.*, Case No. 21STCV07206, California

12 Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding; and

13 • *Iraheta v. Legacy Farmers, Inc.*, Case No. MSC21-00762, California Superior Court,

14 County of Contra Costa, Honorable Edward G. Weil presiding;

15 • *Davood v. NKSFB, LLC., et al.* Case No. 22STCV17305, California Superior Court,

16 County of Los Angeles, Honorable Christopher K. Lui presiding;

17 • *Hardy v. Texas Roadhouse Management Corp., et al.* Case No. CIVSB2222259,

18 California Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;

19 • *Michelle v. Smithfield Packaged Meats Corp., et al.* Case No. JCCP5244, California

20 Superior Court, County of San Bernardino, Honorable Jesica Morgan, presiding;

21 • *Hernandez v. SC Commercial, LLC, d.b.a. SC Fuels, et al.*, Case No. 30-2020-01166961-

22 CU-OE-CXC, California Superior Court, County of Orange, Honorable Lon. Hurwitz presiding;

23 • *Hines v. Constellis Integrated Risk Management Services, et al.* Case No.

24 20STCV26962, California Superior Court, County of Los Angeles, Honorable Christopher K. Lui

25 presiding;

26 • *Iraheta v Legacy Farmers, Inc., et al.* Case No. MSC21-00762, California Superior

27 Court, County of Los Angeles, Honorable Charles S. Treat presiding; and

28 • *Landin v Central Janitors' Supply Co., Inc., et al.* Case No. CV-21-006391, California

1 Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding.

2 12. I believe that I am sufficiently experienced and qualified to evaluate the Class
3 Members' claims and viability of Defendant's defenses.

4 13. Currently, my firm is acting as counsel in tens of wage and hour class actions and
5 representative PAGA actions.

6 14. Class Counsel believe no conflicts, disabling or otherwise, exists between Plaintiff
7 and Class Members because Plaintiff alleges to have been damaged by the same alleged conduct
8 of Defendant (i.e., Plaintiff classified as a non-exempt, hourly-paid employee, not paid premium
9 pay, etc.) and thus has the incentive to fairly represent all Class Members' claims to achieve the
10 maximum possible recovery.

11 15. After a thorough investigation and settlement discussions, Class Counsel arrived at
12 terms that they viewed was in the best interest of both the Class Members and the Parties.

13 16. Should the Court refuse to grant preliminary approval of this Settlement, many of
14 the Class Members may be denied any recourse for Defendant's alleged violations.

15 17. For these reasons, as well as the reasons provided in the Declaration of Vedang J.
16 Patel, I believe that Class Counsel are sufficiently experienced and qualified to evaluate the Class
17 Members' claims and viability of Defendant's defenses.

18 18. I believe, and as further set out in the Declaration of Vedang J. Patel, the settlement
19 presented here only resulted after engaging in extensive informal discovery and investigation and is
20 the product of hard-fought litigation and extensive arm's-length negotiations.

21 19. I believe, based on my experience as class counsel, that the settlement is fair,
22 reasonable, adequate and in the best interests of class members.

23 ///

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct this March 8, 2026 at Los Angeles, California.

26 /s/ David D. Bibiyan

27 _____
28 David D. Bibiyan