

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

CLASS ACTION

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

**DECLARATION OF DAVID YEREMIAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND REPRESENTATIVE ACTION
SETTLEMENT**

Hearing Information:

Date: April 16, 2026

Time: 8:15 a.m.

Department: 2

1 **J. GILL LAW GROUP, P.C.**

Jasmin K. Gill, Esq. (Cal Bar No. 315090)
2 Ashlie E. Fox, Esq. (Cal. Bar No. 294407)
Sacha Pomares, Esq. (Cal Bar No. 337642)
3 515 South Flower Street, Suite 1800
Los Angeles, California 90071
4 Tel: (310) 728-2137; Fax: (310) 728-2137

5 **D.LAW, INC.**

6 Roman Shkodnik (SBN 285152)
r.shkodnik@d.law
7 Enoch J. Kim (SBN 261146)
e.kim@d.law
8 Emma Geesaman (SBN 352715)
e.geesaman@d.law
9 Antonia McKee (SBN 344511)
a.bliznets@d.law
10 250 N. Madison, Ave., 2nd Floor,
Pasadena, CA 91101-1639
11 Tel: (818) 962-6465; Fax: (818) 962-6469

12 **DAVID YEREMIAN & ASSOCIATES, INC.**

13 David Yeremian (SBN 226337)
david@yeremianlaw.com
14 250 N. Madison, Ave., 2nd Floor,
Pasadena, CA 91101-1639
15 Tel: (818) 962-6465; Fax: (818) 962-6469

16
17 Attorneys for Plaintiffs, on behalf of themselves and
all others similarly situated and aggrieved
18
19
20
21
22
23
24
25
26
27
28

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

I, David Yeremian, declare as follows:

1. I am an attorney licensed and admitted to practice before all courts of the State of California, the United States District Court for the Central, Southern, Eastern, and Northern Districts of California, and the Ninth Circuit Court of Appeals. I am a managing attorney of D.Law, Inc., counsel for Plaintiff Alfredo Rivera (“Plaintiff”) on behalf of himself and similarly situated employees of defendants Hollandia Dairy, Inc., Hollandia Farms North, Inc., and Hollandia Farms, Inc. (“Defendants”). I and my firm are referred to herein as Class Counsel. I have personal knowledge of the facts herein and if called as a witness, I could and would competently testify.

2. I graduated from UC Berkeley in 1997 and received my law degree and MBA from UCLA in 2001. I am a member of the Los Angeles County Bar Association and the California Employment Lawyers Association. I have been honored as a Super Lawyers Rising Star in 2009, 2010, 2012-2015. I have been named and honored as a Super Lawyer since 2016.

3. I am experienced in prosecuting employment matters, particularly class actions. In addition to the present case, I am also class counsel for dozens of other putative wage-and-hour class-action lawsuits pending in various state and federal jurisdictions throughout California.

4. My extensive experience in litigating employment wage and hour matters has been integral in identifying legal issues, evaluating the strengths and weaknesses of a case, and generally negotiating fair and reasonable class action settlements. Practice in the narrow field of wage and hour litigation requires skill and knowledge concerning the constantly evolving substantive law (state and federal), as well as the procedural law of class action litigation. In this action, I am fully equipped to use the skills and knowledge I have developed through more than a decade of prosecuting and defending wage and hour class actions to fairly and adequately represent the interests of the Class. Therefore, on the account of my resources, experience, and knowledge, I am well qualified to act as Class Counsel and represent Plaintiff and the putative Class Members in this action.

5. In the last several years I have had several contested class cases certified. When

1 necessary, we pursue cases on appeal. Owing to my experience, I am well qualified to evaluate the
2 class claims in this action, to evaluate settlement v. trial and defenses raised. I have negotiated
3 over 100 class action settlements, including many involving the same issues presented in this case.
4 A selection of cases wherein I have served as lead or co-lead class counsel includes: *Galavis v.*
5 *Patina Restaurant Group, LLC* (LASC BC375225; class size approx. 10,000; co-lead counsel);
6 *Milford v. ADT Security Services, Inc.* (CACD CV08-2236; class size approx. 2,000; lead
7 counsel); *Carreon v. Wolfgang Puck Catering and Events, LLC* (LASC BC398569; class size
8 approx. 1,400; lead counsel); *Fluke v. RFG Oil, Inc.* (LASC BC403354; class size approx. 1,400;
9 lead counsel); *Urena v. Camachos Restaurant* (LASC BC365913; class size approx. 887; lead
10 counsel); *Smith v. Rio Rancho Pontiac GMC Buick Inc.* (LASC BC391187; class size approx. 860;
11 lead counsel); *Callela v. Dolce Group* (LASC BC364711; class size approx. 600; lead counsel);
12 *Vasquez v. The Hollywood Pig n Whistle LP* (LASC BC335075; class size approx. 600; lead
13 counsel); *Goldman v. Aorta Restaurant Operating LP* (LASC BC379688; class size approx. 300;
14 lead counsel); *Sink-Crilly v. Centex Homes* (CACD CV09-2476; class size approx. 250; lead
15 counsel); *Utley v. Cranbrook Partners Inc.* (LASC BC392813; class size approx. 200; lead
16 counsel); *Garcia v. California Credits Group* (LASC BC353213; class size approx. 160; lead
17 counsel); *Afanasyev v. Miller Infiniti, Inc.* (LASC BC350788; class size approx. 160; lead
18 counsel); *Morris v. Gymboree, Inc.* (LASC BC393270; class size approx. 150; lead counsel);
19 *Ortega v. AJC Sandblasting, Inc.* (LASC BC378806; class size approx. 140; lead counsel);
20 *Lulejyan v. Jim Falk Motors of Beverly Hills, Inc.* (LASC BC398459; class size approx. 72; lead
21 counsel); *Rylko v. The Griddle Café, Inc.* (LASC BC386126; class size approx. 70; lead counsel);
22 *Healy v. Siemens IT Solutions and Services, Inc.* (Santa Clara Superior Court 108CV113479; class
23 size approx 60; lead counsel).

24 6. This Declaration is offered in support of Plaintiffs' motion for preliminary approval
25 of a settlement agreement negotiated and entered into at arm's length by the parties herein.

26 7. I and my firm have no conflicts of interest with the administrator, Class Members,
27 or the *Cy Pres* recipients Visalia Rescue Mission and San Diego Rescue Mission.
28

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

Executed this 10th day of March 2026 at Pasadena, California.

[Signature]

David Yermian