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Attorneys for Plaintiffs
Matthew Savattieri, individually and on behalf of all others
similarly situated

[Additional counsel listed on next page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, SPRING STREET COURTHOUSE**

MATTHEW SAVATTIERI, on behalf of
himself and all others similarly situated;

Plaintiff,

vs.

AMI EXPEDITIONARY HEALTHCARE,
LLC, a Delaware limited liability company;
AMI EXPEDITIONARY HEALTHCARE
(USA), LLC, a Wyoming limited liability
company; and DOES 1 through 25,
inclusive.

Defendants

SHORNIKAY CALLUM, an Individual,
on behalf of herself and all others similarly
situated

Plaintiffs,

vs.

AMI EXPEDITIONARY HEALTHCARE
(USA), LLC, a Wyoming Limited Liability

CASE NO.: 21STCV33372

[Consolidated with Case Nos. 21STCV45611
and 21STCV46752]

[Assigned for all purposes to Hon. Kenneth R.
Freeman Department 14]

CLASS ACTION

**DECLARATION OF BRUCE
KOKOZIAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: March 19, 2024
Time: 11:00 a.m.
Department: 14

Complaint Filed: September 10, 2021
Trial Date: None Set

Company; AMI EXPEDITIONARY
HEALTHCARE, LLC, a Delaware Limited
Liability Company and DOES 1 through
100, Inclusive

Defendants

ASHLEY CHARLEMAGNE, BRIANA
HUGUELY, MARLA LEWIS, and
SHARON LEWIS, on behalf of themselves
and others similarly situated

Plaintiffs,

vs.

AMI EXPEDITIONARY HEALTHCARE
(USA), LLC, a Wyoming limited liability
company; AMI EXPEDITIONARY
HEALTHCARE, LLC, a Delaware limited
liability company; AMI HEALTH, a
business entity of unknown form; AMI
EXPEDITIONARY HEALTHCARE, a
business entity of unknown form; and DOES
1 through 50, Inclusive

Defendants.

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8 Attorneys for Plaintiffs
9 ASHLEY CHARLEMAGNE,
BRIANNA HUGUELY, MARIA LEWIS,
10 and SHARON LEWIS on behalf of themselves and others similarly situated

11
12 **DECLARATION OF BRUCE KOKOZIAN IN SUPPORT OF PLAINTIFFS' MOTION**
13 **FOR FINAL APPROVAL OF CLASS SETTLEMENT**

14 I, Bruce Kokozyan, declare:

15 1. I am an attorney licensed to practice before all courts of the State of California. I
16 am Class Counsel for the class action Plaintiffs herein and have personal knowledge of the facts
17 thereto. If called as a witness, I could and would competently testify herein.

18 **A. Qualifications of Class Counsel**

19 2. I have been in practice for approximately over 25 years and have focused my
20 practice on representing employees in employment-related matters including wage and hours class
21 actions and employment discrimination.

22 3. I graduated from UCLA with a B.A. in Economics in 1994. My G.P.A. was 3.95. I
23 was Phi Beta Kappa and Summa Cum Laude at UCLA. I received my Juris Doctor from UCLA
24 School of Law in Los Angeles in 1997. I was admitted to the State Bar of California in 1998. I am
25 admitted to practice in all state courts in California, United States District Courts of California,
26 and the United States Supreme Court. I am an active member Consumer Attorneys Association of
27 Los Angeles ("CAALA") and Consumer Attorneys of California ("CAOC"). I have operated my
28 own law firm since 1999. Initially, with my own law firm where I was a partner and since 2010

1 with Kokozyan Law Firm, APC where I am the principal.

2 4. I am currently lead counsel on numerous class actions and representative action
3 cases. I also am regularly asked to speak at seminars and CLE's on wage and hour and
4 employment related issues. I have been invited to lecture and/or provide informational seminars
5 regarding California employment discrimination and wage and hours laws. I have provided such
6 lectures to the prominent entertainment law firm of King Holmes Paterno & Berliner, LLP in
7 Century City and also provided such lecture to the Beverly Hills Bar Association. I along with a
8 partner from Sheppard, Mullin, Richter & Hampton LLP presented a program regarding California
9 Employment Law to the Beverly Hills Bar Association.

10 5. I have handled no less than several hundred employment litigation matters,
11 including class actions, to successful resolution. I have achieved significant settlements, trial and
12 arbitration victories for Plaintiffs in employment matters.

13 6. For the last six years, I have also been recognized as a "Super Lawyer" for being
14 in the top 5% of attorneys in Southern California.

15 7. I am very experienced class action counsel, including specific focus in the
16 areas of wage and hour issues. Some of the class action and wage and hour litigation on which I
17 have served as lead and/or Class Counsel are as follows: *Grant v. Preferred Response Security*
18 *Services*- LASC Case No. BC413046; *Barseghian v. KFORCE Inc.*- LASC Case No. BC419387;
19 *Floch v. San Gabriel Transit, Inc.*- LASC Case No. BC411319; *Vitaliano Gonzalez et al. v. Grant*
20 *Parking, Inc.*- LASC Case No. BC410406; *Cotti Foods Wage and Hour Cases*- Case No. JCCP
21 4599; *Batts v. Hyde Park Convalescent Hospital, Inc.*- LASC Case No. BC445405; *Browning v.*
22 *CCA Educorp, Inc.* - LASC Case No. BC440579; *Hager v. Diversified Education Co.*- LASC
23 Case No. BC452566; *Tomasi v. Verdugo Hills Hospital*- LASC Case No. BC494171; *Alvarez v.*
24 *Mountain Valley Express*- LASC Case No. BC535460; *Cochran v. Schwan's Home Service, Inc.*-
25 LASC Case No. BC449547; *Ortiz v. Vantage Oncology LLC*- LASC Case No. BC560016; *Rosero*
26 *v. East L.A. Doctors Hospital, LP* - LASC Case No. BC505483; *Manuel Martinez Rodriguez v.*
27 *Willdan Lighting & Electric of California*- LASC Case No. BC554885; *Leon v. Double Zero Inc.* -
28 LASC Case No. BC547803; *Ricardo Gonzalez v. MedReach, Inc.* - LASC Case No. BC567883;

1 Jose S. Soto v. Covenant Security Services, LTD- Case No. CIVDS1413482; Dashanna Wilson v.
2 Molina Healthcare, Inc.- LASC Case No. BC597353; Ambrose v. Associated Ready Mixed
3 Concrete, Inc.- LASC Case No. BC598309; Beltran v. Rogers-Premiere Unloading Services LLC
4 –Case No. RIC1405217; Guerrero v. Trim-Lok, Inc.- Case No. 30-2015-0081132-CU-OE-CXC;
5 Juan Rios v. Luarmark Enterprises, Inc.- LASC Case No. BC650323; Sandoval v. Nowhere
6 Venice Corp.- LASC Case No. BC640108; Henry Ramos v. Moog, Inc. - LASC Case No.
7 19STCV41880; Cristian Rivas v. Jeff & Tony's DSD, LLC - LASC Case No. 19STCV41499;
8 Mayoral v Antelope Valley Fair - LASC Case No. 20STCV07232; Mayoral v Friends of the
9 Antelope Valley Fair - LASC Case No. 20STCV07465; and Jeffrey Tucker v Armorcast Products
10 Company, Inc. - LASC Case No. 20STCV07252.

11 8. Each of these cases are different and have different legal issues, but ultimately the
12 goal is to maximize settlement for Class Members in light of the specific facts and factors of each
13 case.

14 9. My firm also been involved in favorable appellate court decisions which have been
15 very important in wage and hour class action law, specifically the case of *Cochran v. Schwan's*
16 *Home Service, Inc.* (2014) 228 Cal.App.4th 1137 (one of the first California cases to consider the
17 California Supreme Court decision in *Duran v. U.S. National Bank Association* (2014) 59 Cal.4th
18 1, holding that plaintiffs can use statistical sampling evidence to establish either liability or
19 damages in a wage and hour class action case. The *Schwan's* opinion is also a seminal case
20 regarding an employers' obligation to reimburse employees' business expenses under California
21 Labor Code section 2802.

22 10. I am also very experienced trial counsel. For example, in 2013, I and another
23 Plaintiff's counsel together achieved one of the highest single Plaintiff employment discrimination
24 awards in Southern California at the time in the amount of approximately 21.7 million dollars in
25 the matter of *Rodriguez v. Valley Vista, Inc.*- LASC case number BC473793. This verdict in 2013
26 was the 94th largest verdict in the United States of America for any type of matter as reported in
27 the Verdict Search publication. Again in 2015, I was able to achieve a significant trial victory in
28 excess of 2.7 million dollars on behalf of an employee who was not accommodated at the

1 workplace due to her disability in the matter of *Hancock v. Time Warner Cable LLC et al.* – LASC
2 case number BC482161.

3 11. I believe based on my education, qualifications and experience in wage and hour
4 class action cases that I am competent to serve as co-class counsel in this matter.

5 12. As co-counsel for Plaintiffs and the proposed Settlement Class, I have been
6 intimately involved in every aspect of this case and believe that the proposed settlement is fair,
7 reasonable and adequate and in the best interest of the Settlement Class.

8 13. Class counsel's lodestar calculation supports the requested attorney's fees. Class
9 counsel charges rates commensurate with the prevailing market rates in the Los Angeles area for
10 attorneys of comparable experience and skill handling complex litigation. My billing rate to be
11 requested is \$1,100 per hour as have been in practice over 25 years. Based on my familiarity with
12 prevailing market rates for work of similar complexity in the Los Angeles area, including my
13 extensive involvement in fee application work on my own behalf and behalf of others, I can attest
14 that this hourly rate is within the prevailing market rate for work of similar complexity performed
15 by attorneys of similar skill and experience.

16 14. My extensive education, experience, progressive Court approvals of my hourly
17 rates, and the history of my approved hourly rates demonstrate that my hourly rate is reasonable.
18 Even almost nine years (9) years ago in 2015, I was approved at the hourly rate of \$700 per hour
19 by Hon. Rafael Ongkeko, on a motion for attorney fees post trial in his court room, and my
20 requested hourly rate has been increasing about 5% yearly since 2015 with my additional
21 experience, knowledge, and demand for my services. I am the Managing shareholder in my law
22 firm and have extensive experience handling class action litigation.

23 15. The billing rates for partners at firms in the Los Angeles Metro Area, my
24 experience and expertise, my prior approval at the requested rate, the results achieved in this case
25 and the contingent nature of the fees in class action cases, all indicate that my current requested
26 hourly rate of \$1,100 per hour is reasonable and should be approved.

27 16. In reference to my work on this case, I have spent a total of 85.4 attorney hours and
28 I expect to spend another 5 hours to prepare for and attend the final approval hearing and ensure

1 proper claims administration and distribution occurs to all class members. As such, I expect to
2 have 90.4 attorney hours in this case. My total lodestar will be \$99,440 [(85.4 hours + 5 hours) x
3 \$1,100/hour] . As confirmed by the declarations of co-class counsel this case was a lot of work. It
4 precluded my practice from taking on other cases as a practice can only properly litigate so many
5 cases at a time.

6 17. This matter was risky. My office and co-counsel offices have not been paid any
7 money for more than two (2) years on this matter. Our attorneys' fees were entirely contingent
8 upon a successful outcome which could not be predicted.

9 18. My office has current total costs of \$3,926.62 related to the subject case. A true
10 and correct copy of my office's cost itemization is attached at Exhibit 1.

11 19. I fully support the settlement in this matter and believe it is in the best interests of
12 the class.

13 20. I also believe that the Class Enhancements of \$5,000 Class Representative Plaintiff
14 Shorniakay Callum is fair and reasonable. This enhancement takes into consideration the time,
15 effort, risks, signing a general release of all claims not just wage and hour claims, stress and the
16 stigma of being a Class representative in a class action labor claim. This amount is also proper
17 because of benefit provided to all Class members as a result of the named Plaintiffs involvement
18 in this litigation.

19
20 I declare under penalty of perjury under the laws of the State of California that the
21 foregoing is true and correct.

22
23 Executed February 12, 2024 at Los Angeles, California.

24 

25 _____
26 Bruce Kokozyan, Declarant
27
28

EXHIBIT “1”

SAVATTIERI VS AMI EXPEDITIONARY HEALTHCARE, LLC, ET AL.

LASC Case No. 21STCV33372

Kokozian Law Firm Itemization of Costs

Vendor	Description	Amount
LASC	Filing fee - Summons & Complaint	\$1,435.00
	Filing fee - Jury deposit	\$150.00
LWDA	PAGA Fee	\$75.00
DDS	Process service	\$163.90
Case Anywhere	Electronic Filing	\$728.81
Case Anywhere	Electronic Service	\$1,152.15
USPS	Postage	\$14.76
	Copies (.50 x 414 copies)	\$207.00
	TOTAL	\$3,926.62