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Attorneys for PLAINTIFF JOSE G. IRIZARRY,
on behalf of himself and others similarly situated

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

LOLA MARCUM, on behalf of herself and
others similarly situated,

Plaintiff,

vs.

HUNTSMAN ADVANCED MATERIALS
AMERICAS, LLC.; and DOES 1 to 100,
inclusive,

Defendants.

Case No.: 22STCV03845

CLASS ACTION

*[Assigned For All Purposes to the Hon. Stuart
M. Rice, Dept. 1]*

**DECLARATION OF VINCENT C.
GRANBERRY IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

DECLARATION OF VINCENT C. GRANBERRY

I, Vincent C. Granberry, hereby declare:

1. I am an attorney duly licensed to practice in the State of California and am one of the attorneys of record at Lavi & Ebrahimian for Plaintiff Jose G. Irizarry in this action against Defendant Huntsman Advanced Materials Americas, LLC ("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 have been practicing law for fifteen (15) years. I have been practicing employment law and class actions with Lavi & Ebrahimian for the last eight (8) years, focusing exclusively on wage and hour class actions and PAGA representative actions. Prior to joining Lavi & Ebrahimian, LLP, I worked at a boutique litigation firm with a primary emphasis on labor and employment matters. I have been involved in numerous employment cases in all aspects from pre-filing through settlement. Mr. Lavi and I, along with other members of my firm, have practiced in the area of labor and employment law almost exclusively. Mr. Lavi has handled numerous cases in all aspects of employment and labor law, including state and federal class actions, wrongful termination, discrimination, harassment, and retaliation cases. Mr. Lavi has tried both labor and employment cases in State and Federal court, and has argued before various Courts of Appeal, on employment issues such as; (1) validity of Arbitration Agreements, (2) Application of Res Judicata in class action cases, and other employment law issues. Mr. Lavi has also been a panelist and/or speaker for various Employment Law Continuing Legal Education Panels on issues of employment law trials, how to proceed and conduct trials, as well as, proving and winning punitive damages. Mr. Lavi has also been named a Southern California Super Lawyer in the area of plaintiffs' employment litigation – class action from 2011 – 2024. Mr. Lavi and I have worked together on and settled numerous wage and hour class actions and we are currently plaintiffs' counsel in numerous others. Some of the class actions that Mr. Lavi has handled against employers on wage and hour issues and have been approved as class counsel consisted of Kaiser Permanente which settled for \$6,510,000.00; Hustler Casino which settled for \$980,000.00; Chevron Stations Inc., which settled for \$4,500,000.00; Commerce Casino which settled for \$1,575,000.00; BP West Coast Products, which settled for \$4,000,000.00; Kaiser Permanente which settled for \$3,600,000.00, Fuddruckers (as lead counsel) which settled for \$900,000.00; Movado Retail Group, Inc. (as lead counsel) which settled for \$728,000.00, Chuck-E-Cheese's (as lead counsel) which settled for \$1,900,000.00; Aero-Electric Connector, Inc. (as lead counsel) which settled for \$1,500,000.00; Clougherty Packing, LLC (as lead counsel) which settled for \$4,250,000.00; and Gruma Corporation (as lead counsel) which defendant's petition to the United States Supreme Court in the matter was denied and the matter settled for

1 \$2,300,000.00. There are numerous other class actions that Mr. Lavi and I have settled as well as
2 pending ones. We have been approved as class counsel by both federal and state Courts. Mr. Lavi,
3 myself, and the other attorneys at Lavi & Ebrahimian who are available to assist us in this case if
4 needed, are fully capable of adequately and fairly representing Plaintiff and the proposed class in
5 this matter. Lavi & Ebrahimian, LLP, has been appointed Class Counsel in over 50 contested
6 proceedings including the following:

- 7 a. Ischak v. Kaiser Foundation Hospitals, Inc., Los Angeles Superior Court Case No.
8 BC343535;
- 9 b. Santana v. El Pollo Loco, Inc., Los Angeles Superior Court Case No. BC369846;
- 10 c. Edlin, et al. v. Fuddruckers, Inc., United States District Court, Central District of
11 California, Case No. CV-07-3678-ABC;
- 12 d. Chavez, et al. vs. CEC Entertainment, Inc. d/b/a Chukee-Cheeses, Los Angeles
13 Superior Court Case No. BC380996;
- 14 e. Bustamante, et al. v. Teamone Employment Specialists, Los Angeles Superior
15 Court Case No. BC383266;
- 16 f. Cervantes, et al. v. Kaiser Foundation Hospitals, Inc., Alameda Superior Court
17 Case No. RG 0265835;
- 18 g. Seng Savang v. Club One Casino; Fresno Superior Court Case No. 05CECG02189;
- 19 h. Norman, et al. v. Movado Retail Group, Inc., United States District Court, Central
20 District of California, Case No. CV08-06691 SVW (PLA);
- 21 i. Shand v. G.A.L.A., Inc. dba Giorgio Armani, Los Angeles Superior Court Case No.
22 BC342588;
- 23 g. Solis v. Plycraft Industries, Inc., Los Angeles Superior Court Case No. BC374816;
- 24 h. Campos v. HWB Carwash, Inc., Los Angeles Superior Court Case No. BC378990;
- 25 i. Acosta, et al. v. Texwood Industries, United States District Court, Central District
26 of California, Case No. CV07-3237-DDP (PLAX);
- 27 h. Arevalo v. Gruma Corporation, Los Angeles Superior Court Case No. BC410322;
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- j. Burrola v. American Promotional Events, Los Angeles Superior Court Case No. BC412315;
- k. Cortez v. Trader Distribution Services, Los Angeles Superior Court Case No. BC397208;
- l. Cueva v. Allied Industries, Inc., Los Angeles Superior Court Case No. BC399431;
- m. Del Toro v. Petco Animal Supplies, Inc., San Diego Superior Court Case No. 37-2009-00103626-CU-OE-CTL;
- n. Garcia v. Home Cooking, Inc., Los Angeles Superior Court Case No. BC451148;
- o. Alcantar v. Amerimax Building Products, Inc., United States District Court, Central District of California, Case No. CV 10-8916 DDP (CWx);
- p. Arancivias v. Clougherty Packaging, LLC dba Farmer John, Los Angeles Superior Court Case No. BC432406;
- q. Barajas v. Menzies Aviation, Inc., United States District Court, Central District of California, Case No CV-10-02315-JEM;
- r. Barrera v. BHFC Operating, LLC dba Bottega Louie, Los Angeles Superior Court Case No. BC462603;
- s. Camacho v. American Textile Maintenance Co., Los Angeles Superior Court Case No. BC452570;
- t. Cortes v. Monsanto Company, Ventura Superior Court Case No. 56-2010-00366952-CU-OE-VTA;
- u. Escobar v. Aero-Electric Connector, Inc., Los Angeles Superior Court Case No. BC421009;
- v. Gomez v. Bacara Resort & Spa, Santa Barbara Superior Court Case No. 1341987;
- w. Gonzalez v. Ashley Furniture Industries, Inc., Los Angeles Superior Court Case No. BC425708;
- x. Gonzalez v. Burrtec Waste Industries, Inc., Los Angeles Superior Court Case No. BC436879;

1 y. Gutierrez v. Visterra Credit Union, Riverside Superior Court Case No.
2 RIC10020183;
3 z. Hernandez v. Kruse & Son, Inc., Los Angeles Superior Court Case No. BC411849;
4 aa. Lopez v. Tecno Industrial Engineering, Los Angeles Superior Court Case No.
5 BC411134;
6 bb. Lowanga v. Continental Currency Services, Inc., Orange County Superior Court
7 Case No. 30-2011-0044011-CU-OE-CXC;
8 cc. Aguilar v. PLS Financial Services, Inc., United States District Court, Central
9 District of California, Case No. CV 10-0415 ODW (FMOx)
10 dd. Lozada v. Classic Party Rentals, Inc., Los Angeles Superior Court Case No.
11 BC443792;
12 ee. Madrid v. OPI Products, Inc., Los Angeles Superior Court Case No. BC451489;
13 ff. Martinez v. J. Fletcher Creamer & Son, Inc., United States District Court Case No.
14 CV 10-0968-PSG-FMOX;
15 gg. Martinez v. Administaff Companies II, L.P., Los Angeles Superior Court Case No.
16 BC425799;
17 hh. Martinez v. Morgans Hotel Group Management, LLC, Los Angeles Superior Court
18 Case No. BC446744;
19 jj. Sanchez v. La Brea Bakery, Inc., Los Angeles Superior Court Case No. BC456420;
20 ii. Montenegro v. Ruggeri Marble and Granite, Inc., United States District Court,
21 Central District of California, Case No. CV-10-00711 JFW (PLAx);
22 kk. Reed v. 99 Cents Only Stores, Los Angeles Superior Court Case No. BC436793;
23 ll. Santos v. Noble Management Group-California, LLC, United States District Court,
24 Central District of California, Case No. CV 10-2594 DSF (VBKx)
25 mm. Taylor v. U.S. Healthworks Holding Company, Inc., Orange County Superior
26 Court Case No. 30-2011-00473505;
27 nn. Valencia Diaz v. Gene Wheeler Farms, Inc., Los Angeles Superior Court Case No.
28 BC436235;

oo. Zad-Behtooie v. Valley Village, Los Angeles Superior Court Case No. BC451490;
pp. Bell v. Aidells Sausage Company, Inc., Alameda Superior Court Case No.
RG10523946;
qq. Negrete v. Cenveo, Inc., United States District Court, Central District of California,
Case No. CV 11-09543 DSF (MRWx);
rr. Bejar v. Exopack-Ontario, Inc., Orange County Superior Court Case No. 30-2011-
00518396-CU-OE-CXC;
ss. Aguilar v. PLS Financial Services, Inc., United States District Court, Central
District of California, Case No. CV 10-0415 ODW (FMOx);
tt. Sparks v. Larry Flynt dba Hustler Casino, Los Angeles Superior Court Case No.
BC320172;
uu. Morris v. Chevron Stations, Inc., Los Angeles Superior Court Case No. BC361380;
Marino v. BP West Coast Products, LLC, Los Angeles Superior Court Case No.
BC357987.

3. Mr. Lavi and other attorneys at Lavi & Ebrahimian made every effort to litigate this action in an efficient and cost-effective manner. Given Mr. Lavi's years of experience, his trial and appellate experience, and the focus of his practice, if he were to charge for this type of work by the hour, his current hourly rate would be \$925 per hour. My hourly rate would be \$725. This rate is the firm's current billing rate and is supported by the extensive and specialized experience in these types of cases and recognized expertise described. I have personal knowledge of the hourly rates charged by other attorneys with comparable experience to mine. Based on that information, I believe that my rate and other attorneys at Lavi & Ebrahimian rates are fully consistent with the market rate for Los Angeles attorneys with comparable expertise, experience and qualifications.

4. The specific work performed by my firm in prosecuting this action has included, but not been limited to: conducting an intake with Plaintiff Irizarry, preparing the pleadings, preparing the letter to the LWDA (the initial Notice of Labor Code Violations Pursuant to Labor Code Section 2699.3 was submitted on behalf of Jose G. Irizarry to the LWDA on July 14, 2022, and a copy of Jose G. Irizarry's PAGA complaint filed in Los Angeles Superior Court was

submitted to the LWDA on February 8, 2023), conducting legal research, reviewing documents and data from Defendants, Plaintiff, and co-counsel, developing the strategy with co-counsel for prosecuting the claims in the cases; reviewing documents;. extensive preparation, development of a thorough knowledge of the legal issues related to certification and liability, full immersion and preparation for the mediation against Defendant, participating in settlement negotiations; negotiating, drafting, and reviewing the Settlement Agreement and Motion for Preliminary Approval. The settlement in this case was reached after extensive negotiations following a day-long mediation with experienced and well-respected mediator Louis Marlin. Based upon the totality of circumstances, I believe that the result achieved in this case is a favorable outcome for all class members.

5. Based on the documents and data reviewed, and the experience of Mr. Lavi and other attorneys at Lavi & Ebrahimian, counsel for Plaintiff Irizarry believes that the settlement reached herein is a fair, reasonable, and adequate result for the class

6. Our firm maintains all records regarding costs expended on each case. I have reviewed the records of costs expended in this matter. According to our records, our firm has incurred at least \$2,373.49, in costs in this matter at this time. This amount includes costs associated with the costs associated with filing of the papers filed and responded to in this matter, travel for mediation, and mediation.

7. There is a fee splitting agreement between Plaintiffs' counsel. The named Plaintiffs have approved to the aforementioned fee-splitting agreement in writing.

8. Based on my experience as Class Counsel and given the legal and factual realities presented in this case, I believe the proposed settlement is fair, reasonable, and adequate for the class members involved and should be approved by the Court.

9. . As a result of my prior experience as class counsel in other class actions, I am fully aware of the responsibilities I would owe as Class Counsel to the Class in this action.

10. Finally, my firm and I are not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the proposed settlement.

I declare under penalty of perjury under the laws of the State of California that the

1 foregoing is true and correct.

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3 Executed on January 09, 2024, Beverly Hills, California.

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/s/Vincent C. Granberry
Vincent C. Granberry

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