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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

JORDAN CASE, JONELL MURPHY, and
MARK FAJARDO, individually, and on behalf
of all others similarly situated, and on behalf of
the State of California and other aggrieved
persons, and DAVID GALVAN, individually, on
behalf of all others similarly situated,

Plaintiffs,

v.

PINNACLE PIPELINE INSPECTION, INC., a
California corporation; and DOES 1 through 10,
inclusive; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 21CV389608

CLASS & REPRESENTATIVE ACTION

*[Assigned for all purposes to Hon. Charles F.
Adams, Dept. 7]*

**DECLARATION OF JOHN G. YSLAS IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

FINAL APPROVAL HEARING

Date: January 9, 2025
Time: 1:30 p.m.
Dept.: 7

Complaint filed: October 29, 2021
FAC filed: October 11, 2023
Trial date: Not set

1 I, John G. Yslas, hereby declare as follows:

2 1. I am an attorney at law licensed to practice before all of the courts of the State of
3 California. I am a senior partner at Wilshire Law Firm, PLC (“WLF”), counsel for Plaintiff Jordan
4 Case, Jonell Murphy, Mark Fajardo, and David Galvan (“Plaintiffs”) in this matter. I am
5 thoroughly familiar with and have personal knowledge of all of the facts set forth herein.

6 2. I submit this declaration in support of Plaintiffs’ Motion for Final Approval of Class
7 Action Settlement.

8 3. Plaintiff is represented by WLF. The attorneys at WLF performed significant work
9 and expended litigation costs in prosecuting this matter with no guarantee of payment.

10 4. WLF was selected by Best Lawyers and U.S. News & World Report as one of the
11 nation’s Best Law Firms since 2020 and is comprised of more than 100 attorneys and over 600
12 employees. WLF is actively and continuously practicing in employment litigation, representing
13 employees in both individual and class actions in both state and federal courts throughout
14 California.

15 5. WLF is qualified to handle this Litigation because its attorneys are experienced in
16 litigating Labor Code violations in individual, class action, and representative action cases. WLF
17 has handled, and is currently handling, numerous wage and hour class action lawsuits, as well as
18 class actions involving consumer rights and data privacy litigation.

19 6. I graduated from the University of California, Santa Barbara with High Honors in
20 1991 with Bachelor of Arts degrees in Psychology. I received my Juris Doctor from UCLA Law
21 School in 1996.

22 7. Upon graduating from law school in 1996, I worked for a boutique law firm
23 practicing general litigation which included employment law matters. Since 2000 (that is, the last
24 23 years) my practice has been exclusively focused on labor and employment matters including
25 handling wage and hour class, collective and representative actions (including the California
26 Private Attorneys General Act, or “PAGA”), including in the international law firms of Morgan,
27 Lewis & Bockius LLP (where I was a senior associate), Foley & Lardner LLP (where I was a
28 partner and a national Vice Chair of the Labor and Employment Group), Norton Rose Fulbright

1 LLP (where I was a partner) and Seyfarth Shaw (where I was a partner and member of the Wage
2 and Hour Practice Group). During my time at these law firms, I was the primary attorney or took
3 a major leading role in defending employers on numerous wage and hour class, collective and
4 representative actions.

5 8. In late June 2022 I left Seyfarth Shaw and joined my current firm, The Wilshire
6 Law Firm, PLC, to represent plaintiff employees. I have been and am handling many wage and
7 hour class and representative actions litigating such matters on behalf of plaintiff employees in
8 numerous Superior Courts and District Courts. From matters representing both plaintiffs and
9 defendants, I have successfully mediated the resolution of many wage and hour class, collective,
10 and representative actions. Just since starting to settle cases in late April 2023 I have already
11 successfully mediated matters in which I have been counsel or co-counsel resulting in over \$75
12 million in settlements which are in the process of being finalized, and with numerous upcoming
13 mediations scheduled. In those and numerous other matters, I have managed and assisted with the
14 litigation and settlement of many wage and hour PAGA and class actions. In those actions, I
15 performed similar tasks as those performed in the course of prosecuting this action.

16 9. I have received numerous awards for my legal work. For example, from 2015 to
17 2018, I was listed in Los Angeles Super Lawyers for Employment Litigation (Thomson Reuters).
18 have also served on numerous prominent boards and in other leadership positions, including
19 currently serving as Southern California Regional President for the Hispanic National Bar
20 Association and on the board of directors of the Mexican American Bar Foundation. I also
21 previously served on the 5-member Los Angeles Civil Service Commission, which generally
22 oversees the personnel decisions for the City of Angeles.

23 10. I have also published numerous blogs on labor and employment issues including on
24 wage and hour issues. For example, I published “Headline News: Wal-Mart v. Dukes-Impact on
25 Class Action Litigation” (while a partner with Foley & Lardner LLP) and “Are You Really
26 Protected From Wage-and-Hour Successor Liability in an Asset Purchase” (while a partner with
27 Seyfarth Shaw LLP). I have also been a presenter at numerous conferences, including being a
28 presenter involving the “Employment Law Update” at a National Employment Law Council

1 conference. I currently bill at an hourly rate of \$1,000.00.

2 11. I recently joined this case as Class Counsel and have dedicated at least two hours of
3 time litigating this matter. Those efforts have included, among other things, reviewing and editing
4 the instant motion for final approval and supporting documents.

5 12. Class Counsel has negotiated a settlement here that they believe is fair, reasonable,
6 and adequate based on their prior experience litigating these types of cases.

7 13. To date, the LWDA has not responded to or objected to the Settlement in this matter.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing
9 is true and correct. Executed on December 16, 2024 at Los Angeles, California.

10
11 
12 John G. Yslas

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1 PROOF OF SERVICE