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Attorneys for Plaintiffs JAVIER MARTINEZ and FERNANDO ROSADO,
on behalf of themselves and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN JOAQUIN

JAVIER MARTINEZ and FERNANDO
ROSADO, on behalf of themselves and
others similarly situated,

Plaintiffs,

v.

ECKERT COLD STORAGE COMPANY
dba ECKERT COLD STORAGE CO, a
California Corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No. STK-CV-UOE-2021-0011211

CLASS ACTION

Assigned for All Purposes To:

Hon: Barbara Kronlund

Dept.: 10D

**DECLARATION OF DAVID YEREMIAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT AGREEMENT**

*[filed concurrently with Plaintiffs' Notice of
Motion and Motion; Memorandum of Points
and Authorities; Declarations of Enoch J. Kim,
Sahag Majarian, Jodey Lawrence, Javier
Martinez, and Fernando Rosado; and
[Proposed] Order]*

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Date: February 24, 2026; February 25, 2026;
March 4, 2026; March 6, 2026; March 10, 2026
Time: 9:00 a.m.
Dept.: 10D

Original Complaint Filed: December 13, 2021
First Amended Complaint Filed: February 16,
2022
Trial Date: None Set

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1 minimum wages, unpaid wages and overtime, failure to provide meal and rest breaks, failure to
2 reimburse necessary business expenses, inaccurate pay statements, and failure to pay timely wages—
3 similar to claims at issue in the present matter.

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

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

16 8. In the last several years, I have had several contested class cases certified. When
17 necessary, we pursue cases on appeal. Owing to my experience, I am well-qualified to assess the
18 PAGA and class claims in this action, evaluate the potential for settlement versus trial, and analyze
19 the defenses raised. I have negotiated over 100 class action settlements, including many involving the
20 same issues presented in this case. A selection of cases wherein I have served as lead or co-lead class
21 counsel includes: *Galavis v. Patina Restaurant Group, LLC* (LASC BC375225; class size approx.
22 10,000; co-lead counsel); *Milford v. ADT Security Services, Inc.* (CACD CV08-2236; class size
23 approx. 2,000; lead counsel); *Carreon v. Wolfgang Puck Catering and Events, LLC* (LASC
24 BC398569; class size approx. 1,400; lead counsel); *Fluke v. RFG Oil, Inc.* (LASC BC403354; class
25 size approx. 1,400; lead counsel); *Urena v. Camachos Restaurant* (LASC BC365913; class size
26 approx. 887; lead counsel); *Smith v. Rio Rancho Pontiac GMC Buick Inc.* (LASC BC391187; class
27 size approx. 860; lead counsel); *Callela v. Dolce Group* (LASC BC364711; class size approx. 600;
28 lead counsel); *Vasquez v. The Hollywood Pig n Whistle LP* (LASC BC335075; class size approx. 600;

1 lead counsel); *Goldman v. Aorta Restaurant Operating LP* (LASC BC379688; class size approx. 300;
2 lead counsel); *Sink-Crilly v. Centex Homes* (CACD CV09-2476; class size approx. 250; lead counsel);
3 *Utley v. Cranbrook Partners Inc.* (LASC BC392813; class size approx. 200; lead counsel); *Garcia v.*
4 *California Credits Group* (LASC BC353213; class size approx. 160; lead counsel); *Afanasyev v.*
5 *Miller Infiniti, Inc.* (LASC BC350788; class size approx. 160; lead counsel); *Morris v. Gymboree,*
6 *Inc.* (LASC BC393270; class size approx. 150; lead counsel); *Ortega v. AJC Sandblasting, Inc.*
7 (LASC BC378806; class size approx. 140; lead counsel); *Lulejyan v. Jim Falk Motors of Beverly*
8 *Hills, Inc.* (LASC BC398459; class size approx. 72; lead counsel); *Rylko v. The Griddle Café, Inc.*
9 (LASC BC386126; class size approx. 70; lead counsel); *Healy v. Siemens IT Solutions and Services,*
10 *Inc.* (Santa Clara Superior Court 108CV113479; class size approx. 60; lead counsel).

11 9. I do not believe that I have any conflicts of interest with the Class or with the Class
12 Representatives. I am not related to the Class Representatives. I have not previously represented
13 Defendant in any matter. I respectfully submit that my colleagues at D.Law, Inc., Law Offices of
14 Sahag Majarian II, and I are well suited to serve as Class Counsel in this action, and we have
15 represented and will continue to vigorously represent the interests of the Class Members and
16 aggrieved employees.

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

19 Executed this 27th day of January 2026, at Glendale, California.

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22 David Yeremian
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