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**LAW OFFICES OF SAHAG MAJARIAN II**

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Attorneys for Plaintiff Gabriela Contreras, on behalf of herself  
and all others similarly situated

**SUPERIOR COURT OF CALIFORNIA**

**COUNTY OF TULARE**

GABRIELA CONTRERAS, on behalf of  
herself and all others similarly situated,

Plaintiff,

v.

ACMPC CALIFORNIA 6, LLC dba  
TREESOURCE CITRUS NURSERY, a  
California Limited Liability Company;  
ACM HUMAN RESOURCES, LLC, an  
Oregon Limited Liability Company; and  
DOES 1 Through 10, inclusive,

Defendants.

Case No. VCU290391

ASSIGNED FOR ALL PURPOSES TO:

The Honorable David Mathias

Department 1

**CLASS ACTION**

**SUPPLEMENTAL DECLARATION OF  
SAHAG MAJARIAN IN SUPPORT OF  
MOTION FOR PRELIMINARY APPROVAL  
OF CLASS AND PAGA REPRESENTATIVE  
ACTION SETTLEMENT**

**Continued Hearing Information**

Date: May 14, 2026

Time: 8:30 a.m.

Dept.: 1

Complaint filed: February 8, 2022

Trial date: Not set

1 I, SAHAG MAJARIAN II, hereby declare:

2 1. I am an attorney duly licensed to practice in the State of California and am the  
3 principal of the Law Offices of Sahag Majarian II, APC, co-counsel to Plaintiff Gabriela  
4 Contreras in this action against Defendants. I have personal knowledge of the following, and if  
5 called and sworn as a witness, I could and would competently testify thereto.

6 2. I submit this Supplemental declaration in response to the Court's Tentative  
7 Ruling issued on April 15, 2026 regarding Plaintiff's Motion for Order Granting Preliminary  
8 Approval of Class Action and PAGA Representative Action Settlement.

9 3. I graduated from Loyola Law School in 1990. Since my graduation, I have been  
10 in private practice primarily representing consumers against insurance companies and workers  
11 against their employers. I have devoted a significant portion of my practice to employment law  
12 and class actions, and have been appointed co-class counsel for the plaintiffs in no less than  
13 300 wage and hour class actions. A sample of these cases are: *Ayvazi v. Ralph Grocery*  
14 *Company*, LASC Case No. BC 382980; *Sandoval vs. Chevron Stations, Inc.*, MCSC Case No.  
15 CV061690; *Nieves v. Roy's Worldwide, Inc.*, OCSC Case No. 06CC0076; *Corado v. Good Year*  
16 *Rubber Corp.*, SBSC Case No. RCV095476; *Pleitez v. Johnson Controls*, LASC Case No.  
17 BC353315; *Serrano v. BC/ Coca Cola Bottling Co. of L.A.*, LASC Case No. BC349904;  
18 *Urbina v. Valley Crest Co.*, LASC Case No. BC356023; *Moraza v. OK International*, OCSC  
19 Case No. 06CC0148; *Deluna v. Target*, LASC Case No. BC353080; *Daglian v. Staples, Inc.*,  
20 LASC Case No. BC375325; *McCoy v. Kimko*, OCSC Case No. 07CC00007; *Ayvazi v. Ralphs*  
21 *Grocery Company*, LASC Case No. BC382980; *Razo v. C & D Zodiac, Inc.*, OCSC Case No  
22 07-CC01373; *Sandoval v. Chevron Stations, Inc.* MCSC Case No. CV061690; and *Gomez v.*  
23 *Spenuzza, Inc. et al*, RCSC Case No RIC524075.

24 4. In the employment class action arena, I have participated in over 300 class  
25 and/or PAGA action mediations. My participation has included extensive preparation,  
26 development of thorough knowledge of the legal issues related to certification and liability, and  
27 full immersion and participation in the mediation and negotiation process. I have also been  
28 designated co-class counsel in various cases where we prevailed in contested class certification

1 motions. These cases include *Herrera v. Mountain Meadow Mushroom Farms, Inc.*, SDCSC  
2 Case No. 37-2009-00092416- CU-MT-CTI; *Aguirre v. California Drop Forge, Inc.*, LASC  
3 Case No. BC374521; *Marroquin v. Swissport North America, Inc.*, LASC Case No. BC390001;  
4 and *Romero v. Hydraulics International, Inc.*, LASC Case No. 19STCV04463.

5 5. Throughout my thirty-six-year career in law, my practice has been exclusively  
6 contingent fee work. Within the class action arena, I have been designated co-class counsel in  
7 no less than 30 class actions that have settled for over \$1 million each. Given my success and  
8 experience, in my contingent fee practice I have averaged over \$900 per hour worked.  
9 Therefore, I believe it is appropriate to set my lodestar at no less than \$900 per hour in this  
10 case. This request is fair in view of the much higher rate per hour that can be justified by the  
11 broadly accepted Laffey Matrix which shows hourly rate of \$1,227 for attorneys out of law  
12 school for more than 20 years.

13 6. My firm undertook this matter on a purely contingent fee basis with no  
14 guarantee that the time expended would result in any recovery or recoupment of costs.  
15 Throughout the past fifty-five months, I have spent a total of 17.40 hours to date in this case.  
16 Based on my billing rate of \$900 per hour, my unadjusted lodestar to date amounts to  
17 \$15,660.00. Attached as Exhibit 1 is a true and correct copy of my time records in this matter.  
18

19 I declare under the penalty of perjury under the laws of the State of California the foregoing is  
20 true and correct and this declaration is executed May 4, 2026 in Tarzana, California.

21 DocuSigned by:

22 Sahag Majarian

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23 SAHAG MAJARIAN II

**EXHIBIT “1”**

**LAW OFFICES OF**  
**SAHAG MAJARIAN II**  
18250 VENTURA BOULEVARD  
TARZANA, CALIFORNIA 91356  
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May 4, 2026

**LEGAL SERVICES**

**Re: CONTRERAS V. ACMPC**

|         |                                                                   |            |
|---------|-------------------------------------------------------------------|------------|
| 9/29/21 | Intake and open file                                              | 1.20 hours |
| 9/30/21 | Investigate corporate entity; TC with client                      | 0.80 hours |
| 10/1/21 | Draft letter to employer                                          | 0.30 hours |
| 1/14/22 | Analyze records from employer                                     | 3.50 hours |
| 1/15/22 | Further analysis of records                                       | 1.10 hours |
| 1/16/22 | Draft email to co-counsel                                         | 0.20 hours |
| 1/18/22 | Further investigation of claims; Draft email to co-counsel        | 0.70 hours |
| 1/23/22 | Review email from co-counsel                                      | 0.30 hours |
| 1/25/22 | Review emails from co-counsel                                     | 0.20 hours |
| 1/26/22 | Legal research                                                    | 0.70 hours |
| 1/28/22 | Review draft complaint                                            | 0.90 hours |
| 2/1/22  | Investigation of corporate entity; Draft email to co-counsel      | 0.40 hours |
| 2/4/22  | Review revised complaint, PAGA letter                             | 0.70 hours |
| 8/3/22  | Meeting with staff re call with client                            | 0.20 hours |
| 8/9/22  | Email from co-counsel; TC with client; Email from defense counsel | 0.30 hours |

|          |                                                                                                                   |            |
|----------|-------------------------------------------------------------------------------------------------------------------|------------|
| 8/17/22  | Review arbitration agreement                                                                                      | 0.50 hours |
| 8/29/22  | Draft email to co-counsel                                                                                         | 0.10 hours |
| 9/19/22  | Review discovery responses                                                                                        | 1.10 hours |
| 10/17/22 | TC with client; Draft email to co-counsel                                                                         | 0.70 hours |
| 11/11/22 | Review email from defense counsel                                                                                 | 0.30 hours |
| 12/7/22  | TC with client; Draft emails to co-counsel;<br>Meeting with staff re Spanish/English<br>versions of arb agreement | 1.60 hours |
| 12/8/22  | Draft email to co-counsel                                                                                         | 0.10 hours |
| 6/3/24   | Draft email to co-counsel; Review email<br>From co-counsel                                                        | 0.20 hours |
| 5/27/25  | Email from mediator Pearl                                                                                         | 0.20 hours |
| 9/18/25  | Review email from mediator Pearl                                                                                  | 0.10 hours |
| 9/30/25  | Review email from Pearl mediation                                                                                 | 0.10 hours |
| 3/24/26  | Draft declaration for preliminary approval                                                                        | 0.50 hours |
| 5/4/26   | Draft supplemental declaration for<br>Preliminary approval                                                        | 0.40 hours |

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Total Hours: 17.40

Hourly Rate: \$900.00

Total Lodestar: \$15,660.00