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Attorneys for Anthony Morris, on behalf of himself
and all others similarly situated

SUPERIOR COURT OF CALIFORNIA**COUNTY OF LOS ANGELES**

ANTHONY MORRIS, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

THE LINCOLN NATIONAL LIFE
INSURANCE COMPANY, an Indiana
Corporation; LINCOLN NATIONAL
CORPORATION, an Indiana Corporation;
and DOES 1 Through 10, Inclusive,

Defendants.

Case No. 22STCV20426

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Lawrence P. Riff

Department SS7

CLASS AND REPRESENTATIVE ACTION**DECLARATION OF SAHAG MAJARINA II
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Dept: SS 7

Judge: Lawrence P. Riff

Complaint filed: June 22, 2022

Trial date: Not set

DECLARATION OF SAHAG MAJARIAN II

I, SAHAG MAJARIAN, hereby declare:

1. I am an attorney duly licensed to practice in the State of California and an attorney at the Majarian Law Group, APC. Majarian Law Group, APC is counsel to Plaintiff Anthony Morris in this action against Defendants. 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 graduated from Loyola Law School in 1990. Since my graduation, I have been in private practice primarily representing consumers against insurance companies and workers against their employers. I have devoted a significant portion of my practice to employment law and class actions, and have been appointed co-class counsel for the plaintiffs in no less than 300 wage and hour class actions. A sample of these cases are: *Ayvazi v. Ralph Grocery Company*, LASC Case No. BC 382980; *Sandoval vs. Chevron Stations, Inc.*, MCSC Case No. CV 061690; *Nieves v. Roy's Worldwide, Inc.*, OCSC Case No. 06CC0076; *Corado v. Good Year Rubber Corp.*, SBSC Case No. RCV095476; *Pleitez v. Johnson Controls*, LASC Case No. BC353315; *Serrano v. BCI Coca Cola Bottling Co. of L.A.*, LASC Case No. BC349904; *Urbina v. Valley Crest Co.*, LASC Case No. BC356023; *Moraza v. OK International*, OCSC Case No. 06CC0148; *DeLuna v. Target*, LASC Case No. BC353080; *Daglian v. Staples, Inc.*, LASC Case No. BC375325; *McCoy v. Kimko*, OCSC Case No. 07CC00007; *Ayvazi v. Ralphs Grocery Company*, LASC Case No. BC382980; *Razo v. C & D Zodiac, Inc.*, OCSC Case No. 07-CC01373; *Sandoval v. Chevron Stations, Inc.* MCSC Case No. CV061690; and *Gomez v. Spenuzza, Inc. et al*, RCSC Case No RIC524075.

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

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

5 4. Throughout my thirty-two 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 \$850 per hour worked.
9 Therefore, I believe it is appropriate to set my lodestar at no less than \$850 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 \$919 for attorneys out of law
12 school for more than 20 years.

13 5. My involvement in this case has included legal research, investigation, extensive
14 preparation, development of a thorough knowledge of the legal issues related to certification
15 and liability, and full immersion and preparation for the mediation against Defendants. The
16 settlement in this case was reached after extensive negotiations following a full day mediation
17 with an experienced and well-respected mediator Louis Marlin. Based upon the totality of
18 circumstances, I believe that the result achieved in this case is an extremely good outcome for
19 all class members.

20 6. Based on my experience as Class counsel in other employment cases and given
21 the legal and factual realities presented in this case, I believe the proposed settlement is fair,
22 reasonable and adequate for the class members. As a result of my prior experience as class
23 counsel in other class actions, I am fully aware of the responsibilities I would owe as Class
24 counsel in this action.

25 7. Majarian Law Group, APC was approached by Plaintiff Anthony Morris
26 February of 2022 in connection with potential employment law claims he believed he had
27 against Defendants. After conducting an investigation of the facts and analysis of the records,
28 our co-counsel Cohelan, Khoury & Singer and Majarian Law Group, APC proceeded with the

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1 filing of a class against Defendants.

2 8. Throughout the past fifteen months, I, along with Garen Majarian from our
3 office, have been involved in the handling of this case. Our work on this case includes but is
4 not limited to pre-litigation research and investigation regarding the Labor Code violations,
5 analysis of the employment entry records, communication with client, and analysis of policies
6 and procedures of Defendants as well as attendance at the mediation with Louis Marlin.

7 9. I am not aware of any other pending matter or action asserting claims that will
8 be extinguished or adversely affected by the settlement.

9 10. Based on my experience in class action litigation, as well as my experience with
10 similar class cases involving similar claims, the settlement amount provides the class of
11 employees with a real and significant benefit. My endorsement of the settlement is without
12 reservation.

13
14 Executed on May 31, 2023 at Tarzana, California.

DocuSigned by:
Sahag Majarian
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Sahag Majarian II