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14 California
15 [*Additional Counsel listed in following page*]

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA

LILIANA SANDOVAL, ELIZETH MONTES
SOTO, and FLOR ESTRELLITA
ARELLANO PETLACALCO, on behalf of
the State of California and themselves and
aggrieved employees,

Plaintiffs,

v.

LAMPS PLUS, INC.; PACIFIC COAST
LIGHTING, INC; LAMPS
PLUS/CENETENNIAL, INC.; and DOES 1
through 100, inclusive,

Defendants.

Case No. 22CV014052

[Assigned to the Hon. Ruben Sundeen, Dept. 23]

**DECLARATION OF GREGORY N.
KARASIK IN SUPPORT OF MOTION
FOR ORDER AND JUDGMENT
APPROVING PAGA SETTLEMENT**

Date: April 30, 2026
Time: 2:30 p.m.
Dept: 23

Reservation ID.: 799595435151

Complaint Filed: July 11, 2022

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10 Attorneys for Plaintiffs

11 **DECLARATION OF GREGORY N. KARASIK**

12 I, Gregory N. Karasik, declare:

13 1. I am an attorney duly licensed to practice before all courts of the State of California. I
14 am one of the attorneys of record for plaintiffs Liliana Sandoval, Elizeth Montes Soto and Flor
15 Estrellita Petlactalco ("Plaintiff") in this action against defendant Lamp Plus, Inc. ("Defendant) and
16 related companies. I have personal knowledge of the matters stated herein and if called and sworn as
17 a witness, I could and would competently testify under oath thereto.

18 Qualifications as Class Counsel

19 2. I graduated from Stanford Law School in 1984. Prior to April 2006, I spent more
20 than 20 years as a labor and employment law litigator, primarily at large and well-known law firms
21 in Los Angeles, where I typically represented the interests of management. I have substantial
22 experience in all facets of litigation in state and federal court, including discovery, law and motion,
23 trial, appeals, arbitration and mediation. I also have many years of experience representing clients in
24 connection with investigations or adversarial proceedings conducted by state and federal government
25 agencies. In the course of my practice as a defense lawyer, I worked on many class actions against
26 large companies and gained significant experience with a wide variety of class action issues.

3. I worked at the Spiro Moss law firm from April 2006 to August 2011. At Spiro Moss, my practice was devoted exclusively to class actions lawsuits on behalf of employees and consumers and I litigated numerous class actions on behalf of plaintiffs. At Spiro Moss I was lead counsel or otherwise exercised significant case handling responsibilities in cases resulting in class action judgments or settlements with a cumulative value in excess of \$70 million.

4. In August 2011, I left Spiro Moss to open my own law practice under the name Karasik Law Firm. As before, my practice is now devoted exclusively to class actions lawsuits on behalf of employees and consumers. Currently, I am lead counsel for plaintiffs in numerous class actions that are pending in state or federal court, including several in which a settlement was reached and preliminary or final approval of the settlement is pending. Since becoming a plaintiff's lawyer at Spiro Moss, I have negotiated more than 75 class action settlements.

5. Over the course of my legal career, I have been involved in filing appeals, writs and/or *amicus curiae* briefs on issues directly related to wage and hour or consumer class actions, resulting in several published and unpublished opinions, and have been an author or speaker at various legal seminars. Among other achievements, I personally briefed and argued the plaintiff's successful appeal before the California Supreme Court in the wage and hour class action case *Pineda v. Bank of America, N.A.* (2010) 50 Cal.4th 1389 and briefed and argued the plaintiff's successful appeal before the Ninth Circuit Court of Appeals in the consumer class action case *Bateman v. American Multi-Cinema, Inc.* (9th Cir. 2010) 623 F.3d 708.

Litigation History

6. On January 2, 2024 Plaintiffs Soto and Petlascalco filed a Complaint for Civil Penalties Under PAGA against Defendant in San Bernardino Superior Court, which was assigned case number CIVSB2401990. Defendant filed an Answer to the Soto/Petlascalco complaint on May 14, 2024.

7. After my co-counsel and I in the Soto/Petlacalco action learned of the PAGA complaint that had been filed by Plaintiff Sandoval in this action, all the Plaintiffs entered into a Joint Prosecution Agreement effective November 19, 2024 and they all participated in a mediation

1 with Defendant on January 24, 2025. Although a settlement was not reached at the mediation
2 session on January 24, 2025 settlement discussions continued thereafter and ultimately resulted in
3 the parties reaching agreement on the material terms of a global settlement.

4 8. Pursuant to the settlement, Soto and Petlascalco were added as Plaintiffs to this action
5 and Plaintiffs filed a First Amended Complaint which consolidated the claims of all Plaintiffs on
6 March 23, 2026 (subject to a hold that expired on April 2, 2026).

7 Evaluation of the Settlement

8 9. I agree with the evaluation of the settlement set forth in the declaration of Plaintiffs'
9 counsel Esther Bylsma. For the reasons set forth therein, I believe that the settlement is fair
10 and reasonable and approval of the settlement by this Court would promote the purposes of PAGA
11 and be in the best interests of the aggrieved employees covered by the settlement.

12 Costs

13 10. Attached as Exhibit 1 is a true and correct copy of my expense records in connection
14 with litigation of the PAGA claims asserted by Plaintiffs in the Soto/Pelascalco action and this action.
15 As reflected by Exhibit 1, my costs to date are \$2,003.58

16 Attorney's Fees

17 11. Attached as Exhibit 2 is a copy of the records of my time devoted to litigation of the
18 PAGA claims asserted by Plaintiffs in the Soto/Pelascalco action and this action. As reflected by
19 Exhibit 2, to date I have spent at least at least 59.0 hours doing so. Based on a lodestar rate of \$925
20 an hour (my current rate for lodestar calculations in major metropolitan jurisdictions, including Los
21 Angeles, San Francisco and Alameda), the lodestar value of the time I have spent on behalf of
22 Plaintiffs in connection with their litigation against Defendant is at least \$54,575.

23
24 I declare under penalty of perjury that the foregoing is true and correct and that this declaration
25 was executed in Pacific Palisades, California on April 2, 2026.

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27 
28 Gregory N. Karasik

EXHIBIT 1

Date Range: All Dates (8/1/2011 – 3/24/2026)

Accounts: All Accounts

Categories: All Categories

Tags: Lamps Plus

Type: Custom

✓ Show Memo/Notes

▼ Money In

\$0.00

▼ Money Out

-\$2,003.58

Attorney Service

-\$344.33

Lamps Plus

-\$344.33

3/7/2024 KLF

CAEFILE

-\$5.25

4/29/2024 KLF

First Legal Network

-\$224.30

5/2/2024 KLF

CAEFILE

-\$5.25

9/3/2024 KLF

CAEFILE

-\$5.25

5/13/2025 KLF

CAEFILE

-\$3.75

7/3/2025 KLF

First Legal Network

-\$42.75

8/15/2025	KLF	First Legal Network	-\$45.90
10/27/2025	KLF	CAEFILE	-\$5.94
1/27/2026	KLF	CAEFILE	-\$5.94

Court Call

-\$144.00

Lamps Plus

11/8/2024	KLF	Chase Credit Crd	-\$72.00
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7/8/2025	KLF	Chase Credit Crd	-\$72.00
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Filing

-\$1,510.00

Lamps Plus

12/8/2023	KLF	Chase Credit Crd	-\$75.00
3/7/2024	KLF	CAEFILE	-\$1,435.00

Postage

-\$5.25

Lamps Plus

12/8/2023	KLF	Chase Credit Crd	-\$5.25
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Money In.

\$0.00

Money In

Money Out

Money Out: -\$2,003.58

Net Total: -\$2,003.58

EXHIBIT 2

1/25/11	0.4 review emails and documents from Sahag
10/11/23	0.2 emails Sahag review client documents; legal research; emails Sahag; draft LWDA
10/25/23	4.6 notice letter
10/26/23	1.8 finalize, submit and mail out LWDA notice letter; email Sahag draft complaint; review local rules; prepare summons, certificate of
12/26/23	4.3 assignment, civil case cover sheet; emails Sahag
1/2/24	0.6 finalize and file initial case documents
3/7/24	0.4 review conformed initial case documents; email Sahag
3/18/24	0.2 arrange for service of initial case documents; email Sahag
3/20/24	0.2 file proof of service summons; email Sahag
3/26/24	0.2 submit FAC to LWDA
4/10/24	0.2 emails defense counsel
4/22/24	0.2 emails defense counsel tel calls defense counsel and Sahag; review Sandoval complaint;
4/23/24	1.6 email defense counsel
5/2/24	0.3 emails Sahag and Carolyn Cottrell
5/3/24	0.2 emails Sahag
5/8/24	0.2 emails Sahag
5/22/24	0.2 emails Sahag
5/24/24	0.2 email defense counsel
8/21/24	0.4 emails defense counsel and Sahag
8/23/24	0.5 tel call defense counsel; email Sahag
8/26/24	1.2 prepare joint CMC statement
8/28/24	0.2 email defense counsel
9/3/24	0.8 finalize, serve and file CMC statement; emails defense counsel
9/9/24	0.5 appear at CMC; emails Sahag

10/16/24	0.2 emails Sahag
11/4/24	0.2 emails Sahag
11/19/24	0.2 email Sahag
12/12/24	0.4 review and sign joint prosecution agreement
12/13/24	0.3 emails Erika and defense counsel
12/17/24	0.2 email Sandoval counsel
12/20/24	0.2 email Sandoval counsel
12/27/24	0.8 prepare notice of association of counsel; email Sandoval counsel
1/13/25	0.2 email Sahag
1/14/25	0.2 emails Sahag
1/15/25	0.2 emails Cottrell's office
1/17/25	0.2 emails Cottrell's office
1/22/25	0.3 review and sign confidentiality agreement; email mediator's office
1/23/25	2.2 emails mediator office; prepare for mediation
1/24/25	9.4 mediation; emails Sahag
1/31/25	0.2 email Cottrell
2/3/25	0.8 draft CMC statement; email defense counsel finalize, serve and file notice of change of address and joint cmc
2/4/25	0.8 statement
2/6/25	0.3 review defendant's notice of change of address; revise proof of service
2/12/25	0.2 emails Sahag
2/19/25	0.2 appear at CMC; email Sahag
2/20/25	0.2 email Sandoval counsel
3/4/25	0.2 review mediator's proposal
3/5/25	0.3 email Sahag and Cottrell

3/6/25	0.2 emails Cottrell and mediator re mediator proposal
3/27/25	0.2 emails Erika
4/8/25	0.1 email Cottrell's office
4/21/25	0.2 emails Sandoval and defense counsel prepare, serve and file notice of change of address; review settlement
5/9/25	1.7 agreement
5/12/25	0.5 email Sandoval counsel
5/13/25	0.6 prepare CMC statement; email defense counsel
5/14/25	0.6 emails defense counsel prepare revised CMC statement; emails defense counsel; serve and
5/15/25	1.2 file CMC statement
5/19/25	0.2 arrange court call appearance
6/3/25	0.2 emails Sandoval counsel review PAGA notice and settlement agreement; emails defense
6/25/25	0.5 counsel and Sahag
7/23/25	0.4 review revised settlement agreement and notice
7/28/25	0.5 prepare CMC statement; email defense counsel
7/30/25	0.4 finalize, serve and file joint statement conference call with Sandoval and defense counsel; prepare
8/12/25	0.8 stipulation re transfer; email Sandoval counsel
8/14/25	0.2 appear for status conference
8/26/25	0.3 emails Sandoval counsel
8/29/25	0.2 emails Sandoval counsel
9/3/25	0.2 email Sandoval counsel
9/10/25	0.3 emails Sandoval and defense counsel
9/12/25	0.2 emails defense counsel review consolidated complaint; review settlement agreement; email
9/24/25	1.3 Sandoval counsel
10/17/25	0.3 emails Sandoval counsel and defense counsel

10/22/25	0.2 tel call defense counsel and Sandoval counsel
10/27/25	0.5 finalize, serve and file Joint CMC statement
10/29/25	0.3 appear at CMC; email Sahag
11/10/25	0.2 review notice of court order; email defense counsel review consolidated complaint and PAGA settlement agreement;
11/14/25	0.8 review and revise individual settlement agreement; email defense
11/24/25	0.6 review settlement agreement; emails Sahag
12/1/25	0.1 email Sahag
12/3/25	0.2 emails Sahag
1/13/26	0.4 prepare CMC statement; email defense counsel
1/16/26	0.2 email defense counsel
1/27/26	0.4 finalize, serve and file joint CMC statement; emails defense counsel
2/3/26	0.8 appear at CMC
2/27/26	0.8 review settlement agreements; email defense counsel and Sahag review stipulation and consolidated complaint; emails Sandoval
3/19/26	0.5 counsel and defense counsel prepare declarations in support of motion for approval of PAGA
3/24/26	2.2 settlement; emails Sahag and Sandoval counsel
3/25/26	0.2 emails Sandoval counsel
4/1/26	0.3 emails Sandoval counsel and Sahag
4/2/26	1.0 emails Sahag and Sandoval counsel; finalize declaration
Total	59.0