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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF PLACER**

GERBER HERNANDEZ, on behalf of the State
of California and other aggrieved persons,

Plaintiff,

v.

L&S CONSTRUCTION SERVICES, INC., a
California corporation; L&S FRAMING, INC., a
California corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: S-CV-0048880

PAGA REPRESENTATIVE ACTION

[Assigned for all purposes to: Hon. Michael
Jones, Dept. 3]

**DECLARATION OF JOHN G. YSLAS IN
SUPPORT OF PLAINTIFF'S MOTION
TO APPROVE PAGA SETTLEMENT**

Motion Hearing Date:

Date: January 30, 2025

Time: 8:25 a.m.

Dept.: 3

Complaint Filed: August 4, 2022
Trial Date: not set

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

1. I am an attorney at law licensed to practice before all of the courts of the State of California. I am a Senior Partner at Wilshire Law Firm, PLC (“WLF”), counsel for Plaintiff Gerber Hernandez (“Plaintiff”) in this matter. I am thoroughly familiar with and have personal knowledge of all of the facts set forth herein.

2. I submit this declaration in support of Plaintiff’s Motion to Approve PAGA Settlement.

Plaintiff’s Counsel’s Qualifications

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

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

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

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

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

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

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

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

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

1 presenter involving the “Employment Law Update” at a National Employment Law Council
2 conference. I currently bill at an hourly rate of \$1,000.00.

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

5 Executed on January 7, 2025 at Los Angeles, California.

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John G. Yslas