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Attorneys for Plaintiff Arianna Carey

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

LUCRETIA FARRAR, on behalf of herself
and all "aggrieved employees" pursuant to
Labor Code § 2698 *et seq.*,

Plaintiffs,

v.

ALLCARE MEDICAL MANAGEMENT,
INC., a California corporation, FAMILY
PLANNING ASSOCIATES MEDICAL
GROUP, INC., a California corporation, and
DOES 1 through 10, inclusive,

Defendants.

CASE NO: CIVSB2219370

*Assigned to the Honorable John M. Pacheco,
Dept. S31*

**DECLARATION OF NAZO
KOULLOUKIAN IN SUPPORT OF
STIPULATION AND [PROPOSED]
ORDER APPROVING SETTLEMENT
OF PRIVATE ATTORNEYS GENERAL
ACT CLAIMS, AND DISMISSING
ACTION WITH PREJUDICE**

Complaint Filed: September 7, 2022

1 I, NAZO KOULLOUKIAN, hereby declare and state as follows:

2 1. I am now and have been at all times relevant to this Declaration an Active Member of
3 the State Bar of California, and Principal and Owner of Koul Law Firm (“Koul Law Firm”), and
4 counsel of record in this action. I make this declaration on the basis of personal firsthand knowledge
5 unless another source of information or belief clearly appears from the context, and as to all such
6 matters I believe them to be true. If called as a witness, I could and would readily and competently
7 testify to all matters stated within

8 2. Plaintiff Arianna Carey worked for AllCare as a medical assistant until July 2022.
9 After thoroughly investigating the facts shared by my client, and analyzing all documents provided,
10 we developed a theory of the case and, on behalf of Ms. Carey, I filed her PAGA notice letter on
11 December 8, 2022. Ms. Carey filed her PAGA Representative Action Complaint on February 14,
12 2023.

13 3. On August 30, 2023, after informal discovery and investigation, and being fully
14 apprised of the value and strength of Plaintiffs’ claims, the Parties successfully negotiated a settlement
15 through arm’s-length negotiations assisted by respected mediator, Brandon McKelvey, Esq. I, along
16 with my co-counsel, obtained and reviewed numerous policy documents and employment records
17 applicable to Plaintiffs and all aggrieved employees. The time and payroll data were also analyzed by
18 a retained expert to establish AllCare’s potential damages exposure and assist in determining a
19 reasonable settlement value. In advance of mediation, I analyzed documents and records, conducted
20 research, and contributed to the drafting of the joint mediation brief.

21 4. I believe that this is an extremely favorable settlement for the affected employees,
22 providing a remedy consistent with what the classes could expect to receive if they prevailed at trial,
23 but without the lengthy delay and risk of loss that a trial and subsequent appeal would entail. The
24 settlement terms represent a compromise of the parties’ disputes and are fair, adequate, and reasonable
25 given the risks that both sides faced in the litigation.

26 5. I received a B. A. in Communication Studies in 2005 from UCLA. I received my J.D.
27 from University of Maryland School of Law in 2008. I became an Active Member of the State Bar
28 of California in June 2009, and have been an Active Member in good standing continuously since
then. I am a current member of the California Employment Lawyers Association (CELA). I have

1 also been named as one of the Rising Stars for the Super Lawyers of Southern California during 2016,
2 2017, and 2018.

3 6. I founded Koul Law Firm in 2017. Prior to starting Koul Law Firm, I was a Senior
4 Associate at Joseph Farzam Law Firm, which was founded in 2002, and where I worked from 2013
5 through to the end of 2016.

6 7. During the approximately fifteen years since I began practicing law, I have built my
7 practice to have a heavy emphasis on employment and related litigation. I have been heavily,
8 successfully, and continuously involved in active litigation and trial work, including without
9 limitation, wage and hour class action litigation, employees' rights, civil rights, discrimination, and
10 sexual harassment claims, and other forms of employment litigation.

11 8. I have litigated hundreds of cases against the largest firms in the country. Because of
12 the unique history and nature of my practice, I operate with a high level of knowledge and experience
13 in areas of wage and hour class actions, and labor and employment law. Currently, more than half of
14 my active caseload includes wage and hour PAGA and class action cases.

15 9. My office is qualified to handle this litigation because we are experienced in litigating
16 Labor Code violations in both individual and PAGA and class actions. I have served as lead counsel
17 in numerous wage and hour PAGA and class actions, and have successfully negotiated several
18 settlements, including multiple six and seven-figure cases, amounting to millions of dollars in
19 settlements.

20 10. I am currently counsel for over twenty class and PAGA matters pending in state and
21 federal court across the state of California. Below is a representative sample of cases wherein I was
22 recently appointed class counsel for cases certified final approval and/or PAGA counsel for approved
23 PAGA settlements:

- 24 • ESTELA MONTIJO v. CENTRAL VALLEY LABOR (Case No. 18-CV-03456) in Merced
25 County Superior Court: In Montijo, the Court approved final approval of myself as lead class
26 counsel representing a class of approximately 858 employees for wage and hour violations.
- 27 • ELIZABETH PARTIDA v. STATER BROS. MARKETS (Case No. CIVDS1828290) in San
28 Bernardino Superior Court: In Partida, the Court granted preliminary approval on February 4,
2020, for a wage and hour violations on behalf of approximately 1,291 class members.

- 1 • RIGOBERTO SANDOVAL v. NOVITEX ENTERPRISE SOLUTIONS, INC. (Case No.
2 BC702200) in Los Angeles County Superior Court: In Sandoval, the Court approved a
3 representative action for wage and hour violations on behalf of 971 aggrieved employees.
- 4 • FRANCISCO CISNEROS & ARMONDO ORTIZ v. LAZY DOG RESTAURANTS, LLC
5 (Case No. 56-2017-00501824-CU-OE-VTA) in Ventura County Superior Court: In Cisneros,
6 the Court approved a representative action for wage and hour violations on behalf of
7 approximately 6,927 aggrieved employees.
- 8 • EDUARDO MARQUEZ & BEATRIZ MARQUEZ v. THREE SONS, INC. DBA
9 AMERICAN MEAT COMPANIES, ET AL. (Case No. BC701526) in Los Angeles Superior
10 Court: In Marquez, the Court approved final approval of myself as lead class counsel
11 representing a class of approximately 249 employees for wage and hour violations.
- 12 • JOSE ESTRADA v. BURLINGAME INDUSTRIES, ET. AL. (Case No. CIVDS1712815 -
13 Consolidated with Case No. CIVDS1805057) in San Bernardino Superior Court: In Estrada,
14 I was lead class counsel representing a class of approximately 740 employees for wage and
15 hour violations.
- 16 • LUIS AVILA v. AL DAHRA ACX, INC., ET. AL. (Case No. BC685992) in Los Angeles
17 Superior Court: In Avila, I was preliminarily approved as lead class counsel representing a
18 class of approximately 280 employees for wage and hour violations.
- 19 • ARMANDO M. BARRETO v. ETIVISTA CONCRETE, ET. AL. (Case No.
20 CIVDS1712018) in San Bernardino Superior Court: In Barreto, I was lead class counsel
21 representing a class of approximately 800 employees for wage and hour violations.
- 22 • DIAZ/JONES v. THE ENSIGN GROUP, INC. ET. AL. (Case No. 19STCV21041) Los
23 Angeles Superior Court: In Diaz/Jones I was lead class counsel representing a class of
24 approximately 240 employees for wage and hour violations.
- 25 • BALDWIN V. FLEXCARE LLC, ET. AL. (Case No. 34-2020-00289550-CU-OE-GDS) in
26 Sacramento Superior Court: In Baldwin, I was appointed class counsel representing class of
27 4,741 employees for wage and hour violations.
- 28 • CASEMENT V. SOLIANT, ET. AL. (KSC Case No. BCV-19-102213) a class action filed on
behalf of healthcare workers alleging labor code violations.

- TERRY V. SOLIANT, ET. AL. (LASC Case No. 20STCV34826) a PAGA only action filed on behalf of healthcare workers alleging labor code violations.
- LEWIS V. AUREUS MEDICAL GROUP, INC. (Orange County Case No. 30-2020-01150700-CU-OE-CXC) a class and PAGA action filed on behalf of hourly healthcare workers.
- DOMINGUEZ V. COMMUNITY VETERINARY CLINICS, LLC, ET AL. (LASC Case No. 20STCV34601) a class and PAGA action filed on behalf of 820 hourly employees alleging labor code violations.
- WOEHRLE V. AMN SERVICES, LLC, ET AL. (LASC Case No. 19STCV15213) a class, FLSA collective, and PAGA action filed on behalf of 2,272 California Class Members, 15,226 FLSA collective members, and 8,494 aggrieved employees, all healthcare workers alleging wage and hour violations.
- ORTEGA V. MICHAEL L. MANNA RANCH, INC., (San Joaquin Superior Court Case No. STK-CV-UOE-2021-5442), a class and PAGA action filed on behalf of over 1,000 field laborers alleging wage and hour violations.

11. I have incurred \$3,043.90 in out-of-pocket expenses to date.

12. Because most individuals cannot afford to pay for representation in litigation on an hourly basis, Koul Law Firm represents virtually all of its employment law clients on a contingency fee basis. Pursuant to this arrangement, we are not compensated for our time and costs unless we prevail at trial or successfully settle our clients' cases. Because Koul Law Firm is taking the risk that we will not be reimbursed for our time and costs unless our client settles or wins his or her case, we cannot afford to represent an individual employee on a contingency basis if, at the end of our representation, all we are to receive is our regular hourly rate for services. It is essential that we recover more than our regular hourly rate when we win if we are to remain in practice to be able to continue representing other individuals in civil rights employment disputes.

13. I believe that the fee and costs provision is reasonable. The fee percentage requested is less than the usual customary percentage fee for most employment cases. Moreover, the efforts of my office have resulted in substantial benefits to the class members, in the form of a substantial settlement fund.

14. As a result of my prior experience as class counsel in other class actions, I am fully aware of the responsibilities I owe as PAGA counsel. I am not aware of any conflict of interest between myself, on the one hand, and Plaintiff or any other aggrieved employee on the other hand.

15. I am not aware of any pending litigation that would be affected by this settlement.

16. For all the reasons provided above, I respectfully request that this Court grant approval of the settlement.

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

Executed on November 27, 2023, at Los Angeles, California.


Nazo Koulloukian