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9
10 **SUPERIOR COURT OF CALIFORNIA**
11 **IN AND FOR THE COUNTY OF LOS ANGELES**

12 CHRISTIAN SOLIS, RENE A. SORTO,
13 AKILA DAVENPORT, PEARL
PALACIOS, CHRISTIAN FERNANDEZ,
14 and RYAN CROWE, as individuals and on
behalf of all others similarly situated,

15 Plaintiffs,

16 v.

17 WORLDWIDE FLIGHT SERVICES,
18 INC., a Delaware corporation; and DOES
1-100, inclusive,

19 Defendants.
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Case No.: 22STCV04332

Assigned for All Purposes to:
Hon. Timothy Patrick Dillon
Dept. SSC-15

**DECLARATION OF MICHAEL
NOURMAND IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: March 24, 2026
Time: 10:00 a.m.
Dept.: SSC-15

1 4. I am fully familiar with the legal and factual issues in this case, and have specific
2 experience litigating complex wage and hour actions as class actions, including employment cases
3 as set forth below.

4 5. Since opening my firm, I have served as lead counsel or co-class counsel in several
5 wage and hour class and/or representative actions seeking wages and penalties owed on behalf of
6 employees, asserting similar claims as the Plaintiffs' lawsuit, where I have been appointed as class
7 counsel:

8 (1) Superior Court of the State of California, County of Los Angeles, Spring
9 Street Courthouse, *Reid v. Cardinal Glass Industries, Inc., et al.*, Case No. BC633874.

10 (2) Superior Court of the State of California, County of San Joaquin, *Azpeitia,*
11 *et al. v. The Newark Group, Inc.*, Case No. STK-CV-UOE-2016-0012282.

12 (3) Superior Court of the State of California, County of Los Angeles, Spring
13 Street Courthouse, *Turner, et al. v. Providence Little Company of Mary Foundation, et al.*, Case
14 No. BC676996.

15 (4) Superior Court of the State of California, County of Kern, *Garza v. Frito-*
16 *Lay, Inc.*, Case No. CV-16-102730 D.L.

17 (5) Superior Court of the State of California, County of Los Angeles, Spring
18 Street Courthouse, *Winters v. The Dependable Companies, et al.*, Case No. BC623839.

19 (6) Superior Court of the State of California, County of Los Angeles, Spring
20 Street Courthouse, *Barretos v. Don Roberto Jewelers, Inc.*, Case No. BC495451.

21 (7) Superior Court of the State of California, Ventura County, *Morales, et al. v.*
22 *Southland Sod Farms Operations, Inc., et al.*, Case No. 56-2017-00496912-CU-OE-V.A.

23 (8) Superior Court of the State of California, Los Angeles County, Spring
24 Street Courthouse, *Castrejon, et al. v. Karen Kane, Inc., et al.*, Case Nos. BC537058 and
25 BC569548.

26 (9) United States District Court, Central District of California, *Balderas v. SPS*
27 *Technologies, LLC*, Case No. 2:14-cv-4036-CAS (VBKx).

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- 1 (10) Superior Court of the State of California, County of Los Angeles, Spring
2 Street Courthouse, *Levkovitch v. Premier Displays & Exhibits, Inc.*, Case No. BC628412.
- 3 (11) Superior Court of the State of California, County of Los Angeles, Spring
4 Street Courthouse, *Pena v. National Diversified Sales, Inc., et al.*, Case No. BC610019.
- 5 (12) Superior Court of the State of California, County of Los Angeles, Central
6 Civil West, *Cortez v. Darling International, Inc.*, Case No. BC525091.
- 7 (13) Superior Court of the State of California, County of Los Angeles, Spring
8 Street Courthouse, *Lopez v. Owens & Minor Distribution, Inc.*, Case No. BC613671.
- 9 (14) Superior Court of the State of California, County of Los Angeles, Spring
10 Street Courthouse, *Starks, et al. v. Mercury Air Cargo, Inc., et al.*, Case No. BC614067.
- 11 (15) Superior Court of the State of California, County of Los Angeles, Spring
12 Street Courthouse, *Calvo v. Craneveyor Corp, et al.*, Case No. BC634012.
- 13 (16) Superior Court of the State of California, County of Los Angeles, Spring
14 Street Courthouse, *Alvarez v. Norman's Nursery, Inc.*, Case No. BC592465.
- 15 (17) Superior Court of the State of California, County of Los Angeles, Central
16 Civil West, *Corlew v. Ferrellgas, Inc., et al.*, Case No. BC521730.
- 17 (18) Superior Court of the State of California, County of Los Angeles, Spring
18 Street Courthouse, *Vela v. Doorking, Inc.*, Case No. BC644377.
- 19 (19) Superior Court of the State of California, County of Los Angeles, Spring
20 Street Courthouse, *Shasheet, et al. v. Pacifica Hotel Company, et al.*, Case No. 603264 and
21 BC635444.
- 22 (20) Superior Court of the State of California, County of Los Angeles, Central
23 Civil West, *Kim, et al. v. Beverly Hills Properties, Inc., et al.*, Case No. BC503462 and
24 BC520587.
- 25 (21) Superior Court of the State of California, County of Los Angeles, Central
26 Civil West, *Benitez, et al. v. Aircraft Service International, Inc.*, Case No. BC534264.
- 27 (22) Superior Court of the State of California, County of Los Angeles, Central
28 Civil West, *Santoyo v. Consolidated Foundries, Inc., et al.*, Case No. BC612298.

1 (23) Superior Court of the State of California, County of Los Angeles, Central
2 Civil West, *Carreon v. Jonathan Louis International, LTD*, Case No. BC543678.

3 (24) Superior Court of the State of California, County of Los Angeles, Spring
4 Street Courthouse, *Garcia, et al. v. American International Industries*, Case No. BC560886.

5 (25) Superior Court of the State of California, County of Los Angeles, Central
6 Civil West, *Badios, et al. v. E.M. Pizza, Inc.*, Case No. BC495252.

7 6. On August 16, 2023, Plaintiff filed a wage and hour class action complaint against
8 Defendant alleging several Labor Code violations and gave notice to the Labor & Workforce
9 Development Agency (“LWDA”) and Defendant of the underlying Labor Code violation. On or
10 about October 11, 2023, Defendant removed the action to United States District Court. On
11 October 24, 2023, Plaintiff filed a stand alone PAGA Representative Action Complaint with the
12 Los Angeles Superior Court. The parties engaged in discovery and thereafter agreed to attend
13 mediation with all pending wage and hour actions with Defendant. The parties were able to reach
14 a global settlement, subject to court approval. As a result of the global settlement, the parties filed
15 an amended action in the Solis Action, adding Plaintiff and our office as counsel for Plaintiff in
16 the Solis Action. Thereafter, Plaintiff dismissed his Class Action pending in the United States
17 District Court, without prejudice and the stand along PAGA Representative Action pending in the
18 Los Angeles Superior Court, without prejudice.

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20 I declare under penalty of perjury under the laws of the State of California that the
21 foregoing is true and correct this 19th day of December 2025, at Beverly Hills, California.

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23 /s/ Michael Nourmand
24 Michael Nourmand
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