

1 JAMIE SERB (SBN 289601)
jamie@crosnerlegal.com
2 NIKKI TRENNER (SBN
nikki@crosnerlegal.com
3 ZACHARY M. CROSNER (SBN 272295)
zach@crosnerlegal.com
4 **CROSNER LEGAL, PC**
9440 Santa Monica Blvd. Suite 301
5 Beverly Hills, CA 90210
6 Tel: (866) 276-7637
Fax: (310) 510-6429

7 Attorneys for Plaintiff CHRISTIAN SOLIS,
8 AKILA DAVENPORT, and PEARL PALACIOS
9 [Additional Counsel on Next Page]

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.
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18 WORLDWIDE FLIGHT SERVICES,
INC., a Delaware corporation; and DOES
19 1-100, inclusive,

20 Defendants.
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Case No.: 22STCV04332

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

**DECLARATION OF HAIK
HACOPIAN IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

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

1 MICHAEL NOURMAND (SBN 198439)
2 JAMES A. DE SARIO (SBN 262552)
3 THE NOURMAND LAW FIRM, APC
8822 West Olympic Boulevard
4 Beverly Hills, California 90211
Telephone: (310) 553-3600
Facsimile: (310) 553-3603

5 Attorneys for Plaintiff RENE A. SORTO

6 ZORIK MOORADIAN (SBN 136636)
7 HAIK HACOPIAN (SBN 282361)
MOORADIAN LAW, APC
8 24007 Ventura Blvd., Suite 210
Calabasas, CA 91302
9 Telephone: (818) 487-1998
10 Facsimile: (888) 783-1030

11 Attorneys for Plaintiff CHRISTIAN FERNANDEZ

12 JOSEPH LAVI (SBN 209776)
13 VINCENT C. GRANBERRY (SBN 276483)
CASSANDRA A. CASTRO (SBN 334238)
14 COLBY A. MEAGLE (SBN 328594)
LAVI & EBRAHIMIAN, LLP
15 8889 W. Olympic Boulevard, Suite 200
Beverly Hills, California 90211
16 Telephone: (310) 432-0000
17 Facsimile: (310) 432-0001

18 Attorneys for Plaintiff RYAN CROWE
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1 **DECLARATION OF HAIK HACOPIAN**

2 I, Haik Hacopian, declare as follows:

3 1. I am an attorney at law duly licensed to practice law in the state of California.
4 I work with Mooradian Law, APC and, along with Zorik Mooradian, am counsel for Plaintiff
5 Christian Fernandez and seek appointment as Class Counsel in the class action lawsuit entitled
6 *Christian Solis, et al. v. Worldwide Flight Services, Inc., Los Angeles County Superior Court,*
7 and bearing Los Angeles County Superior Court Case No. 22STCV04332. I make this
8 Declaration in support of Plaintiffs' Motion for Preliminary Approval based on my own
9 personal knowledge and if called as a witness I could and would competently testify to the
10 following facts stated herein.

11 2. I am a 2010 graduate of St. John's University School of Law. I was admitted
12 to the New York State Bar in February of 2011 and was assigned Registration Number
13 4895728. I was admitted to The State Bar of California on April 25, 2012 and was assigned
14 State Bar Number 282361 and have been active and in good standing since. I have
15 been involved in the litigation of complex cases at all stages throughout my career including
16 wage and hour class actions and representative PAGA actions. I am currently actively
17 involved with numerous class action and PAGA matters in various litigation stages.

18 3. The following is a short title index of wage-and-hour class action cases in
19 which I have represented and/or continue to represent named plaintiff in the capacity of co-
20 counsel: Nuno v. Universal Building Maintenance/BC541570; Perez v. Quest
21 Nutrition/BC630914; Cabrera v. Complete Facilities Maintenance/BC538248; Cardenas v.
22 Iron Mountain/BC620476 (appointed as class counsel); Hernandez v. Johnny
23 Rockets/BC604536; Castro v. Advanced Cosmetic Research/BC634270; Linares v. Personal
24 Touch Cleaning/BC613182; Escalante v. Friendly Hills Country Club/BC640583 (appointed
25 as class counsel); Fuentes v. Kamran Staffing/BC604535 (appointed as class counsel);
26 Martinez v. Pampanga Food Company/BC637207; Perez v. El Pollo Loco/JCCP4957
27 (appointed as class counsel); Rosa v. Intercontinental Hotels/BC566377; Serrano v. Noise
28 (appointed as class counsel); Contreras v. Golden State Foods/BC708535; Avina v. Marriott

Vacations Worldwide/8:18-cv-00685-JVS-JPR (appointed as class counsel); Balaguer v. Eminent, Inc/19STCV16803 (appointed as class counsel); Gonzalez v. FMS Management/30-2019-01065563-CU-OE-CXC (appointed as class counsel); Ramos v. Liberty Container Corp./20STCV06560 (appointed as class counsel); Mendoza v. Savage Services Corporation/18STCV04798 (appointed as class counsel); Moreno v. DCX-Chol Enterprises/19STCV19105 (appointed as class counsel); Villacana v. Crothall Laundry Services/19STCV16330.

4. I am familiar with California wage and hour law including the laws governing the alleged violations and the Orders of the Industrial Welfare Commission, and the Private Attorneys General Act.

5. I know of no conflicts as to why I, or Mr. Mooradian, could not serve as Class Counsel in this matter. I also know of no conflicts that would preclude Mr. Fernandez from serving as a Class Representative in this matter.

6. As a result of my prior experience, including as class counsel in other wage and hour class actions, I am fully aware of the responsibilities I owe as Class Counsel to the proposed class in this action. Based on my experience as Class Counsel, I believe, in light of the criteria identified in *Dunk v. Ford Motor Co.* (1996) 48 Cal. App. 4th 1794, 1801, that the proposed settlement is fair to the class, reasonable and more than adequate in view of (i) the strength of Plaintiffs' claims and Defendant's defenses, (ii) the risk, expense, complexity and likely duration of further litigation, (iii) the risk and difficulty of obtaining class certification and maintaining class action status through trial, (iv) the total settlement amount of \$5,115,000 offered in settlement allowing for significant individual recoveries by employees, (v) the discovery conducted by the Parties in this case, (vi) my experience with similar settlements in wage and hour class actions that have received court approval, and (vii) the fact that the settlement was the result of arms' length negotiations between experienced counsel facilitated by a respected neutral mediator.

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

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Executed this 17th day of February 2025, in Pasadena, California.

/s/Haik Hacopian
Haik Hacopian, Declarant