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Attorneys for Plaintiff CHRISTIAN SOLIS,
AKILA DAVENPORT, and PEARL PALACIOS

SUPERIOR COURT OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

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

Plaintiffs,

v.

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

Defendants.

Case No.: 22STCV04332

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

**DECLARATION OF ZORIK
MOORADIAN IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

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

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DECLARATION OF ZORIK MOORADIAN

I, Zorik Mooradian, declare as follows:

1. I am an attorney at law duly licensed to practice law in the state of California. I am the principal of Mooradian Law, APC and, along with Haik Hacopian, am counsel for Plaintiff Christian Fernandez and have been appointed as Class Counsel in the class action lawsuit entitled *Christian Solis, et al. v. Worldwide Flight Services, Inc.*, and bearing Los Angeles County Superior Court Case No. 22STCV04332. I make this Declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement based on my own personal knowledge and if called as a witness I could and would competently testify to the following facts stated herein.

2. I attended Texas A & M University (Kingsville) and California State University Los Angeles (Los Angeles), and I received a Bachelor of Science degree in Civil Engineering in 1979. I have also attended University of La Verne College of Law, graduated, and was admitted to the State Bar of California in 1988, and have been in good standing since. For the past 35 years, I have litigated hundreds of cases with numerous bench and jury trials. My most recent employment jury verdict was in October 2019, in a Fair Employment and Housing retaliation matter, ranked in the US as the top 100 employment verdicts for that year. I have also been and continue to be plaintiff's counsel in many wage and hour and consumer class actions, complex and multi-party matters.

3. The following is a sample index of class actions/PAGA and individual employment/wage-and-hour cases, in which I have represented and/or continue to represent the plaintiffs, mostly in the capacity of the lead counsel:

4. Granados v. Bimbo Bakeries/CV 09-07329 DMG; Garcia v. Pharmavite /BC435699; Barsamian/Park v. Staples /BC450208 and BC449815; Bosch v. Bakery Holdings/BC484494; Uribe v. American Guard Services/ BC492881; Gamez-Flores v. Haynes Building Services/BC493709; Rodriguez v. KBS/ BC537386; Tovar v. Baron HR, LLC/ BC517984; Perez v. Valleycrest/ BC 538257; Uscanga v. Automotive Creations/BC509401; Gonzales v. Nefab Packing/2;13-cv-04499 JAK-ss; Mendoza v.

1 Accentcare/30-2013-00661891-CU-OE-CXC; Nuno v. Universal Building
2 Maintenance/BC541570; Cabrera v. Complete Facilities Maintenance/BC538248; Valencia
3 v. Rubbercraft/BC 535816; Fuentes v. Kamran Staffing/BC604535; Perez v. El Pollo
4 Loco/BC624001; Perez v. Quest Nutrition/BC630914; Escalante v. Friendly Hills Country
5 Club/BC640583; Serrano v. Noise Group/30-2017-00949440-CU-OE-CXC; Bitton v.
6 Sterling Jewelry, Inc./CIVDS1612665; Blandin v. Malibu Mgt. Svcs., Inc./BC618629;
7 Barrera v. Coast Composites, Inc./30-2017-00909572 CU-OE-CJC; Aguilar v. Sweet Earth
8 Café/19STCV13373; Avina v. Marriott/30-2017-00945551; Azepita v. Eden Social
9 Restaurants, Inc./30-2019-01077185; Balaguer v. Eminent, Inc./19STCV16803; Barragan v.
10 Golden Hotels Limited Partnership/30-2018-01007420; Boch v. Merchants Building
11 Maintenance/BC681320; Bueno v. Proto Homes/19STCV20011; Cardenas v. Intercon
12 Security/19STCV11259; Castillo v. Robert's Waste/30-2018-01027486; Castro v. Bee Gee
13 Laboratories/BC712857; Contreras Teo v. Golden State Foods/BC708535; Contreras Teo v.
14 Golden State Foods/BC722540; Corona v. Del Amo Hospital/19STCV24741; Cruz Ventura
15 v. WSON-55/19STCV22958; Cruel v. Andreas Elsenhans/19STCV35496; Espinoza v. Don
16 Chava Mgt./19STCV27068; Galvan v. Property Mgt. Associates/BC722781; Godoy v.
17 UCLA/19STCV04634; Gonzalez v. Toyon Catering, Inc./19STCV11369; Gonzalez v. FMS
18 Mgt./30-2019-01065563; Gutierrez v. Anaheim Denn/30-2019-01092546; Guzman v.
19 Millennium Shoes/19STCV33166; Hernandez v. Township Retail Services/18STCV06709;
20 Hernandez v. Resource Employment Solutions/30-2019-01084740; Herrera v. Color Spot
21 Nurseries/30-2017-00933249; Leon v. Island Hospitality Mgt./30-2019-01060719; Martinez
22 v. Snakerz/19STCV02674; Mendoza v. Savage Service Corp./18STCV04798; Martinez v.
23 Riviera Beverages/ 30-2019-01056796; Mendoza v. United Production Framing/30-2019-
24 01104255; Angulo Cano v. Coordinated Staffing/19STCV29817; Moreno v. DCX-CHOL
25 Enterprises/19STCV19105; Moreno v. DCX-CHOL Enterprises/19STCV26247; Contoran
26 Najera v. TOPH I, LLC/30-2018-00999474; Nunez v. Wonderland Montessori,
27 LLC/18STCV06042; Enriquez v. The Johnny Rockets Group/19STCV43986; Pallares -
28 Mercado v. MB Santa Ana Restaurants/30-2019-01047135; Perez v. First Rate

1 Staffing/18STCV02057; Popoca v. Denim Technologies/ 19STCV11434; Reidy v. City of
2 Inglewood/18STCV09373; Rosales v. DBR Premium/19STCV32726; Salceda v. GBG USA,
3 Inc./ 18STCV10004; Salceda v. GBG USA, Inc./ 18STCV04778; Torres v. Metro
4 Security/19STCV21114; Torres v. Metro Security/19STCV15680; Trujillo v. Securitas
5 Security Services/19STCV01207; Villacana v. Crothall Laundry Services,
6 Inc./19STCV16330; and Villareal v. Golden Touch Cleaning/30-2019-01108777.

7 5. I am familiar with California wage and hour law and the laws governing the
8 alleged violations in this matter, including but not limited to: California Labor Code Sections
9 201 – 204, 206.5, 210, 226, 221, 224, 226.7, 227.3, 233, 350, 351, 245.5, 246, 246.5, 500,
10 510, 512, 516, 1174, 1194, 1194.2, 1198, 1198.5, 2698, 2699, 2800 and 2802, California
11 Business and Profession Codes 17200 et. seq., the Orders of the Industrial Welfare
12 Commission, and the Private Attorneys General Act.

13 6. I have been appointed as Class Counsel on behalf of the settlement class. I
14 know of no conflicts that would preclude me, or Mr. Hacopian, from continuing to serve as
15 Class Counsel in this matter. I also know of no conflicts that would preclude Mr. Fernandez
16 from continuing to serve as a Class Representative in this matter.

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

counsel facilitated by a respected neutral mediator.; and (viii) the positive response to the settlement from the class.

8. I have spent at least 33 hours on this case. At my current hourly rate of \$850, my lodestar would total \$28,050. Mr. Hacopian has spent at least 46 hours on this case, which at this current hourly rate of \$600, results in an additional lodestar of \$27,600. Thus, the total lodestar from Mooradian Law, APC for this matter tallies to **\$55,650**. The categories of work Mr. Hacopian and I have performed on this file are as follows:

Category/Tasks	ZM	HH
Preliminary case work including intake and retention, assessment of file for potential claims/lawsuits, review of client records, communication of records request letter to employer and review and assessment of produced records, research into parties, claims, and potential defenses, review of other pending and related matters/settlements, and incidental work:	10	5
Work on file prior to appearances by Defendant including prep of case initiating pleadings incl complaint, amended complaint, service, prep and communicate PAGA letter, case calendaring, continuance requests, and incidental work:	6	8
Work on file post-appearance including litigation, pleadings, conferences with counsel, review and assessment of removal and bases to remand, prep and review scheduling report, status reports, calendaring, initial disclosures and document requests, and incidental work:	10	16
Attn to Motion to Compel Arbitration and prep of opposition	3	8
Post-settlement work including work on MOU, long-form agreement, review with Plaintiff Fernandez, communications w/counsel, attn to amended settlement documents and execution thereto, attention to prelim approval motion and declarations, and incidental work:	3	6
Post-Preliminary Approval work including class notice process, communications with administrator and counsel, attn to final approval motion and edits thereto	1	3
HOURS	33	46

9. My office has also incurred **\$1,715.56** in costs as follows:

Date	Cost	Subject
8/23/2023	\$75.00	LWDA Submission Fee for PAGA Notice
9/26/2023	\$1,435.00	LASC Civil and Complex Filing Charges
9/26/2023	\$59.99	OneLegal Lawsuit Filing Charges
11/14/2023	\$17.66	OneLegal Amended Complaint Filing Charges
11/21/2023	\$51.48	OneLegal Service of Process Charges
12/5/2023	\$13.33	OneLegal Order Filing Charges
12/6/2023	\$41.33	OneLegal Request Filing Charges
	\$ 1,715.56	

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

Executed on August 13, 2026 in Calabasas, California.

/s/Zorik Mooradian
Zorik Mooradian