

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 Edelmira Maldonado and seek appointment as Class Counsel in the class action lawsuit
6 entitled *Darwin Colinayo and Edelmira Maldonado, on behalf of themselves and others*
7 *similarly situated v. McKesson Medical-Surgical Inc.*, and bearing Placer County Superior
8 Court Case No. S-CV-0049039. I make this Declaration in support of Plaintiffs' Motion for
9 Preliminary Approval of Class Action Settlement based on my own personal knowledge and
10 if called as a witness I could and would competently testify to the 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 class actions and individual
19 employment/wage-and-hour cases (recent past and pending), in which I have represented
20 and/or continue to represent the plaintiffs or defendants in the capacity of co-counsel or lead
21 counsel: Nuno v. Universal Building Maintenance /BC541570; Cabrera v. Complete
22 Facilities Maintenance/BC538248; Fuentes v. Kamran Staffing/BC604535; Perez v. El Pollo
23 Loco/BC624001; Perez v. Quest Nutrition/BC630914; Escalante v. Friendly Hills Country
24 Club/BC640583; Molina v. Pacific Coast Sightseeing Tours/BC671102; Serrano v. Noise
25 Group/30-2017-00949440-CU-OE-CXC; Balaguer v. Eminent, Inc./19STCV16803; Avina v.
26 Marriott/30-2017-00945551; Barragan v. Golden Hotels Limited Partnership/30-2018-
27 01007420; Boch v. Merchants Building Maintenance /BC681320; Castillo v. Robert's
28 Waste/30-2018-01027486; Castro v. Bee Gee Laboratories/BC712857; Contreras Teo v.

1 Golden State Foods/BC708535; Contreras Teo v. Golden State Foods/BC722540; Corona v.
2 Del Amo Hospital/19STCV24741; Cruz Ventura v. WSON-55/19STCV22958; Galvan v.
3 Property Mgt. Associates/BC722781; Gonzalez v. Toyon Catering, Inc./19STCV11369;
4 Gonzalez v. FMS Mgt./30-2019-01065563; Gutierrez v. Anaheim Denn/30-2019-01092546;
5 Hernandez v. Township Retail Services/18STCV06709; Hernandez v. Resource Employment
6 Solutions/30-2019-01084740; Leon v. Island Hospitality Mgt./30-2019-01060719; Mendoza
7 v. Savage Service Corp./18STCV04798; Martinez v. Riviera Beverages/ 30-2019- 01056796;
8 Mendoza v. United Production Framing/30-2019- 01104255; Morales Cano v. Coordinated
9 Staffing/19STCV29817; Moreno v. DCXCHOL Enterprises/19STCV26247; Alvarez v.
10 Greenfield Care Center of Fullerton/30-2017-00958478; Pallares - Mercado v. MB Santa Ana
11 Restaurants/30-2019-01047135; Perez v. First Rate Staffing/18STCV02057; Popoca v.
12 Denim Technologies/19STCV11434; Salceda v. GBG USA, Inc./ 18STCV10004; Salceda v.
13 GBG USA, Inc./18STCV04778; Torres v. Metro Security/19STCV21114; Torres v. Metro
14 Security/19STCV15680; and Villacana v. Crothall Laundry Services, Inc./19STCV16330;
15 Cuellar v. First Transit, Inc./8:20-cv-01075-JWH-(JDEx)

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

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

22 6. As a result of my prior experience, including as class counsel in other wage
23 and hour class actions, I am fully aware of the responsibilities I owe as Class Counsel to the
24 proposed class in this action. Based on my experience as Class Counsel, I believe, in light of
25 the criteria identified in *Dunk v. Ford Motor Co.* (1996) 48 Cal. App. 4th 1794, 1801, that the
26 proposed settlement is fair to the class, reasonable and more than adequate in view of (i) the
27 strength of Plaintiffs' claims and Defendant's defenses, (ii) the risk, expense, complexity and
28 likely duration of further litigation, (iii) the risk and difficulty of obtaining class certification

1 and maintaining class action status through trial, (iv) the total settlement amount of \$3,500,000
2 offered in settlement allowing for significant individual recoveries by employees, (v) the
3 discovery conducted by the Parties in this case, (vi) my experience with similar settlements in
4 wage and hour class actions that have received court approval, and (vii) the fact that the
5 settlement was the result of arms' length negotiations between experienced counsel facilitated
6 by Mr. Steve Serratore, a respected neutral mediator.

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

9 Executed this 4th day of September 2024, in Calabasas, California.

10 /s/Haik Hacopian

11 Haik Hacopian, Declarant
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