

Roman Otkupman, CSBN 249423
Roman@OLFLA.com

Nidah Farishta, CSBN 312360
Nidah@OLFLA.com

OTKUPMAN LAW FIRM, A LAW CORPORATION

5743 Corsa Ave., Suite 123,
Westlake Village, CA 91362
Telephone: (818) 293-5623
Facsimile: (888) 850-1310

Attorneys for Plaintiff,
Taiwo Oyeleye, on behalf of himself and all others similarly situated, and on behalf of the general public.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

TAIWO OYELEYE, on behalf of himself and
all others similarly situated, and on behalf of
the general public,

Plaintiff,

vs.

INCLUSION SERVICES, LLC, a
California Limited Liability Company, and
DOES 1 through 10, inclusive,

Defendants.

Case No. 25STCV18888

**DECLARATION OF NIDAH FARISHTA
IN SUPPORT OF PLAINTIFF TAIWO
OYELEYE'S MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

Date: October 20, 2026

Time: 10:00 a.m.

Dept.: 15

Judge: Hon. Timothy Patrick Dillon

1 **I, NIDAH FARISHTA, declare as follows:**

2 1. I am an attorney duly admitted to the practice of law in the State of California. I am
3 an Attorney at Otkupman Law Firm, A Law Corporation, and counsel for Plaintiff Taiwo Oyeleye,
4 as well as proposed PAGA Counsel in this action. I have personal knowledge of the facts set forth
5 herein and if called as a witness to testify to them, I could and would do so competently.

6 2. I obtained my Bachelor's degrees from Southern Methodist University in Dallas,
7 Texas in 2013. I majored in Philosophy and Sports Management.

8 3. Thereafter, I attended University of San Diego School of Law and graduated with a
9 Juris Doctor degree in 2016.

10 4. I became a member of the California bar in December of 2016 and have been an active
11 member in good standing continuously through that time.

12 5. Since June of 2017, I have been employed at Otkupman Law Firm, A Law
13 Corporation. I have been directly involved in litigating numerous wage and hour class action cases
14 and have focused my practice exclusively in employment litigation.

15 6. While employed at the Otkupman Law Firm, A Law Corporation, I have been
16 appointed as PAGA Counsel in numerous class and representative wage and hour cases.

17 7. Otkupman Law Firm, A Law Corporation prosecutes wage and hour cases on behalf
18 of the employees whose rights have been violated. Otkupman Law Firm, A Law Corporation, either
19 on its own or with co-counsel is currently serving as Plaintiff's counsel of record in dozens of wage
20 and hour and employment class action cases pending in both state and federal court.

21 8. Otkupman Law Firm, A Law Corporation has successfully litigated and resolved
22 numerous wage and hour class and representative actions involving failure to pay wages, wage
23 statement violations and derivative Labor Code claims and penalties.

24 9. I have spent no less than 16.3 hours on this case from its inception to the present. My
25 current hourly rate is \$600.00 per hour as an attorney practicing for over 9 years and based on my
26 experience as counsel of record in numerous wage and hour and employment class action cases.

27 10. I am not aware of any other class, representative or other collective action in any other
28 court that asserts claims similar to those asserted herein.

I declare under penalty of perjury under the laws of the States of California that the foregoing

1 is true and correct. Executed this 8th day of September 2026 at Winchester, California.

2
3 

4 _____
Nidah Farishta

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28