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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES—TORRANCE COURTHOUSE

KENNETH AGNER, individually, and on
behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act,

Plaintiff,

vs.

ELWOOD STAFFING SERVICES, INC.,
an Indiana corporation; JOHN ELWOOD,
individually; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 25TRCV02965

Honorable Alan B. Honeycutt
Department E

**DECLARATION OF RYAN SLINGER IN
SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF PAGA
SETTLEMENT**

Date: October 27, 2026
Time: 8:30 a.m.
Department: E
Reservation ID: 400670975015

Complaint Filed: August 29, 2025
Trial Date: None Set

DECLARATION OF RYAN SLINGER

I, Ryan Slinger, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Kenneth Agner (“Plaintiff”). The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PROCEDURAL HISTORY

2. On June 25, 2025, Plaintiff provided notice by electronic upload to the Labor and Workforce Development Agency (“LWDA”) and written notice by certified mail to Defendants of the specific provisions of the California Labor Code that were alleged to be violated (“PAGA Notice”).

3. On August 29, 2025, Plaintiff filed a Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, *Et Seq.* in the Superior Court of California for the County of Los Angeles, thereby commencing the above-captioned lawsuit.

4. On November 19, 2025, Defendant Elwood Staffing Services, Inc. (“Defendant”) filed an Answer to Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, *Et Seq.*

5. On April 17, 2026, Plaintiff and Defendant (together, the “Parties”) participated in an all-day mediation presided over by Chad Anderton, Esq., a well-respected mediator experienced in mediating complex labor and employment matters.

WORK PERFORMED BY PLAINTIFF’S COUNSEL

6. Several attorneys at Lawyers *for* Justice, PC have been actively engaged in this litigation from the inception of the above-captioned action, which was filed on August 29, 2025. Lawyers *for* Justice, PC has fully and actively participated in the litigation process throughout the pendency of the litigation. Lawyers *for* Justice, PC joined forces with counsel Parker & Minne, LLP (together, the firms are referred at as “Plaintiff’s Counsel”) to pursue the case. The work of the firms has been a coordinated and combined effort. Ultimately, the efforts of Plaintiff and Plaintiff’s Counsel have resulted in a settlement recovery.

7. Before initiating the case, Lawyers *for* Justice, PC investigated and researched the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and Plaintiff, and research into the various legal issues involved in the case, namely, the current state of the law as it applied to representative actions, off-the-clock theory, meal and rest periods, expense reimbursements, recordkeeping and wage statement requirements, and wage-and-hour law and enforcement, Plaintiff's claims and allegations, and potential defenses. Plaintiff's core allegation is that Defendant with respect to Plaintiff, Aggrieved Employees and the State of California, *inter alia*, engaged in conduct giving rise to penalties recoverable under the Private Attorneys General Act of 2004 (California Labor Code sections 2698, *et seq.*).

8. Plaintiff's Counsel conducted formal and informal discovery and investigation into the facts of the case, to assess the veracity, strength, and scope of the claims, prior to reaching the Settlement. The Parties exchanged a volume of information, documents, and data in the course of the litigation and in connection with the mediation and settlement negotiations. Plaintiff's Counsel propounded multiple sets of formal written discovery requests onto Defendant (specifically, Form Interrogatories—General (Set One), Special Interrogatories (Set One), and Requests for Production of Documents (Set One)). Additionally, Plaintiff's Counsel noticed the deposition of Defendant's Person Most Qualified designee. The information, documents, and data that were reviewed and analyzed by Plaintiff's Counsel included and were not limited to: Plaintiff's employment records, Aggrieved Employees' time and payroll data, Defendant's Employee Handbook, and Defendant's operations and employment practice, policies, and procedures, among other information and documents. Plaintiff's Counsel had the opportunity to obtain information from Plaintiff, and reviewed and analyzed a volume of information, data, and documents obtained from Plaintiff, Defendant, and other sources. Plaintiff's Counsel developed liability, damages, violation, and penalties valuation models in the course of litigation and in connection with the mediation and settlement negotiations and settlement, among other tasks.

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1 9. After conducting significant investigation of the facts and law during the
2 prosecution of the case, counsel for the Parties engaged in extensive settlement negotiations to try
3 to resolve the case. These efforts included participating in a formal mediation session conducted
4 on April 17, 2026, by Chad Anderton, Esq., a well-regarded mediator experienced in handling
5 complex labor and employment matters. During all settlement discussions, the Parties conducted
6 their negotiations at arm's length in an adversarial position.

7 **ATTORNEYS' FEES REQUESTED BY PLAINTIFF'S COUNSEL**

8 10. By way of the accompanying Motion for Approval, Plaintiff's Counsel seek
9 attorneys' fees in the amount of \$105,000.00, which is thirty-five percent (35%) of the Gross
10 Settlement Amount of \$300,000.00. Pursuant to the contingency-fee agreement entered into by
11 and between Plaintiff and Plaintiff's Counsel, Plaintiff has agreed to a contingency fee of at least
12 thirty-five percent (35%) of the recovery.

13 11. The attorneys' fees sought are commensurate with: (1) the risk that Plaintiff's
14 Counsel took in commencing the case; (2) the time, effort, and expense that Plaintiff's Counsel
15 dedicated to the case; (3) the skill and determination that Plaintiff's Counsel have shown; (4) the
16 results that Plaintiff's Counsel have achieved throughout the litigation; (5) the value of the
17 settlement that Plaintiff's Counsel have achieved in the case; and (6) the other cases that Plaintiff's
18 Counsel have turned down in order to devote their time and efforts to this matter.

19 12. The nature of the work performed, skill exercised, and the outcome in this matter
20 support the percentage fee sought. This matter involves an outstanding monetary recovery
21 involving a Gross Settlement Amount of \$300,000.00—with an Aggrieved Employees' Fund of
22 approximately \$57,113.46 to be paid to Aggrieved Employees.

23 13. While not necessarily required to be demonstrated because the percentage fee is
24 proper for this settlement, Plaintiff's Counsel has incurred many hours of work in connection with
25 prosecuting the case such that the award of attorneys' fees is also justified under a lodestar analysis.
26 Attorneys at Lawyers *for* Justice, PC have spent at least **46.40 hours** performing tasks and
27 obtaining recovery in this matter. Attached hereto as "**EXHIBIT A**" is an Attorney Task and Time
28 Chart that sets forth in detail the nature of the legal services provided by attorneys at Lawyers *for*

Justice, PC and the time incurred by them in performing those services. These hours include work done by several attorneys at Lawyers for Justice, PC. Also, separate from the hours referenced herein and in the chart, Lawyers for Justice, PC had litigation support personnel actively engaged in assisting with the prosecution of this matter.

14. The work performed in this particular matter, the background of Lawyers for Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour actions, and in particular, employment class action and representative action cases, support a reasonable blended hourly rate of compensation of at least \$850 per hour for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$850 per hour for legal services performed, by courts granting approval of settlements in other wage-and-hour class action and representative action cases: final approval of the class and representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of attorneys' fees involved compensation at the rate of \$936.47 per hour; final approval of the class and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of attorneys' fees involved compensation at the rate of \$919.57 per hour; and final approval of the class and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved compensation at the rate of \$855.96 per hour.

EXPERIENCE AND ADEQUACY OF

LAWYERS for JUSTICE, PC

15. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers for Justice, PC is attorney of record in over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers for Justice, PC is comprised of attorneys who

1 focus on litigating complex wage-and-hour class and Private Attorneys General Act (“PAGA”)
2 representative actions. The firm has successfully litigated cases involving nearly every aspect of
3 California wage and hour law, including payment of overtime and minimum wage, provision of
4 meal and rest breaks and/or premium wages for same, timely payment of wages, provision of
5 compliant wage statements, reimbursement of business expenses, executive, administrative, and
6 other overtime exemptions to the State of California and federal overtime compensation
7 requirements, PAGA claims, and sister statutes under federal law. During a relatively short time,
8 in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on
9 behalf of thousands of individuals in California.

10 16. Edwin Aiwarzian is the Chief Executive Officer of Lawyers *for* Justice, PC. He
11 received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a
12 Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive
13 formal training in dispute resolution and negotiation from the Straus Institute for Dispute
14 Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has
15 previously served as a pro bono mediator for the Los Angeles County Superior Court. In October
16 of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During
17 the summer of 2000, he studied Legal Writing at Harvard University. From approximately
18 September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable
19 Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From
20 approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the
21 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
22 In December of 2004, he obtained a license to practice law from the California State Bar. Since in
23 or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively
24 focused on the prosecution of consumer and employment class actions. While employed by
25 Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over
26 one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial,
27 and attended over one hundred seventy-five (175) mediations. Together with other attorneys at the
28 firm, and in some cases in conjunction with co-counsel, he has successfully litigated cases

1 involving the executive, administrative, and other overtime exemptions to the State of California
2 and federal overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC
3 has successfully obtained class certification by contested motion practice in approximately sixteen
4 (16) cases in the last decade and litigated over 1,000 class action or representative action cases.

5 17. Arby Aiwazian is a Senior Partner of Lawyers *for* Justice, PC. He received his
6 Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum
7 laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School. From
8 approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
9 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
10 From approximately August 2008 to approximately December 2008, he served as a Judicial Extern
11 to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit.
12 He was admitted to practice law in California in 2010. He is admitted to practice before all courts
13 of the State of California and all United States District Courts in the State of California. He has
14 worked on many wage-and-hour class action and representative action cases, taking the lead in
15 taking and defending depositions, arguing motions, and attending mediations. He has played an
16 integral role in preparing matters for class certification, including and not limited to, successful
17 certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No.
18 BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.
19 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No.
20 RG13680477). Under his supervision, dozens of class action or representative action cases have
21 resulted in settlements that have been granted court approval. He has handled over one hundred
22 and fifty (150) mediations and worked on over two hundred and fifty (250) class action or
23 representative action cases which have resulted in settlement.

24 18. Joanna Ghosh is a Senior Partner of Lawyers *for* Justice, PC. She received a
25 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
26 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
27 Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010),
28 in New York (since 2013), and in Washington (since 2026), and she is admitted to practice in all

1 U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California,
2 the U.S. District Court for the Western District of Washington, and the U.S. Supreme Court. She
3 has taken and defended dozens of depositions and successfully handled motion practice in class
4 action cases regarding discovery (including and not limited to, regarding class contact
5 information), class certification (both contested class certification and stipulated class
6 certification), arbitration agreements, coordination, and intervention. She has successfully handled
7 briefing and oral argument on appeal and obtained notable decisions regarding the Private
8 Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential*
9 *Overall Supply*, 9 Cal.App.5th 439 (Cal. Ct. App., Mar. 7, 2017), cert. denied (Cal., May 24, 2017),
10 cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court*, 8 Cal.5th 175 (2019). She has
11 significant experience with class actions, including and not limited to working on cases to obtain
12 class certification through contested motion practice and working on cases in the post-certification
13 stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial
14 preparation in conjunction with co-counsel in a case involving a certified class consisting of
15 approximately 2,600 individuals). She also has extensive experience with class action and/or
16 representative action settlements, and she has handled this process in over three hundred (300)
17 cases. Under her, Edwin Aiwasian and Arby Aiwasian, Lawyers *for* Justice, PC has handled the
18 class certification and court approval process for hundreds of class action and/or representative
19 action matters that have successfully resolved. She is a member of the California Employment
20 Lawyers Association and, on several occasions, she has been a speaker regarding topics in wage
21 and hour law at the organization's continuing legal education events.

22 19. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree
23 from the University of Michigan in 2020, and I earned my Juris Doctor degree from Loyola Law
24 School in 2023. I was admitted to practice law in California in 2023. I am admitted to practice
25 before all courts of the State of California. I have worked on many wage-and-hour class action and
26 PAGA representative cases, and my work on these cases has included preparing pleadings and
27 motions, making court appearances, drafting and finalizing settlement agreements.

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LITIGATION COSTS AND EXPENSES INCURRED BY

LAWYERS *for* JUSTICE, PC

20. To date, Plaintiff's Counsel have borne all of the risks and costs of litigation and will not receive any compensation until recovery is obtained in this matter. The Settlement provides for reimbursement of Plaintiff's Counsel's litigation costs and expenses in the amount of up to \$20,000.00. Lawyers *for* Justice, PC seeks reimbursement of **\$13,789.57** in litigation costs and expenses incurred in this matter, as reflected in "**EXHIBIT B**" attached hereto. These expenses were reasonable and necessary in the prosecution of this matter and to obtain the Settlement Agreement.

SERVICE AWARD TO PLAINTIFF

21. In exchange for his broader individual waivers and release of claims against the Released Parties with a California Civil Code Section 1542 waiver (set forth in Section 54 of the Settlement Agreement), and also in recognition of his effort and work spearheading the prosecution of the case and serving as the Plaintiff, the Settlement provides for a Service Award in the amount of up to \$10,000.00 to Plaintiff. Plaintiff spent a substantial amount of time and effort discussing his employment with Plaintiff's Counsel, gathering and providing relevant documents and information, and providing facts and evidence to support the prosecution of the claims. Plaintiff was available whenever Plaintiff's Counsel needed him and actively tried to obtain and provide information that would help obtain a recovery in this matter. Accordingly, it is fair and appropriate for Plaintiff to receive \$10,000.00 as a reasonable Service Award, in addition to his Individual PAGA Payment.

22. I submit that the Agreement is fair, reasonable, and adequate, and is in the best interests of Plaintiff, Aggrieved Employees, and the State of California.

23. No one at Lawyers *for* Justice, PC has any financial interest in the Settlement Administrator, Apex Class Action, LLC, which would create a conflict of interest.

24. After conducting diligent investigation and research, I am unaware of any other class, representative, or collective actions in any other court that assert claims that are similar to those alleged in this Action, or which may be impacted by the proposed Settlement.

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

3 Executed this 5th day of August 2026, at Glendale, California.

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EXHIBIT A

KENNETH AGNER V. ELWOOD STAFFING SERVICES, INC.
Los Angeles County Superior Court Case No. 25TRCV02965

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Kenneth Agner (“Plaintiff”)	6.50
Investigate, Communicate with, Interview, and/or Review Communication with Aggrieved Employees and/or Percipient Witnesses	5.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff’s Private Attorneys General Act (“PAGA”) Claim, Conduct Legal Research and Analysis Regarding the PAGA Claim, and Draft, Review, and/or Revise Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, <i>Et Seq.</i> (filed on August 29, 2025)	7.50
Review Court’s Notice of Case Assignment (filed on August 29, 2025)	0.30
Review Court’s Notice of Case Management Conference and Order to Show Cause (Hearing) (filed on September 3, 2025)	0.20
Draft, Review, and/or Revise Notice of Association of Counsel (filed on November 17, 2025)	0.10
Review and Analyze Defendant Elwood Staffing Services, Inc.’s (“Defendant”) Answer to Plaintiff’s Complaint for Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, <i>Et Seq.</i> , and Research Affirmative Defenses in Defendant’s Answer (served on November 19, 2025)	0.50
Meet and Confer with Defendant’s Counsel, and Draft, Review, and/or Revise Joint Stipulation to Dismiss Defendant John Elwood Without Prejudice; [Proposed] Order (submitted on December 10, 2025)	0.20

Review Court's Order to Dismiss Defendant John Elwood Without Prejudice (filed on December 19, 2025)	0.10
Draft, Review, and/or Revise Plaintiff's Case Management Statement (filed on February 6, 2026)	0.20
Review Defendant's Case Management Statement (served on February 9, 2026)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on February 24, 2026)	0.20
Draft, Review, and/or Revise Plaintiff's Case Management Statement (filed on May 27, 2026)	0.20
Review Defendant's Case Management Statement (served on May 29, 2026)	0.20
Review Court's Minute Order Re: Case Management Conference (filed on June 16, 2026)	0.20
Discovery and Deposition	
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Kenneth Agner (served on May 6, 2025)	2.50
Draft, Review, and/or Revise Plaintiff's Notice of Deposition of Defendant's Person Most Qualified (noticed for February 25, 2026) (served on December 2, 2025)	0.30
Draft, Review, and/or Revise Form Interrogatories – General (Set One), Special Interrogatories (Set One), and Requests for Production of Documents (Set One) to Defendant (served on December 2, 2025)	0.50
Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Kenneth Agner under the Private Attorneys General Act (served on June 25, 2025)	4.50
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with, Defendants' Counsel	3.80
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiff, Defendant (approximately 9,766 pages), and Other Sources Prior to Mediation, Research Settlement and Merits-Related Issues, Perform Claim Evaluation and Analysis, and Review Plaintiff's Mediation Brief	10.50

Review and/or Analyze Mediator's Proposal (issued April 17, 2026; accepted April 21, 2026)	0.20
Draft, Review, Revise, Negotiate, and/or Finalize Memorandum of Understanding of PAGA Settlement (executed on April 30, 2026)	0.50
Draft, Review, Revise, Negotiate, and/or Finalize Joint Stipulation of PAGA Settlement (executed on June 18, 2026)	1.50
Law and Motion	
Research, Draft, Review, and/or Revise Declaration of Ryan Slinger in Support of Plaintiff's Motion for Approval of Private Attorneys General Act Settlement	4.80
Total Hours:	46.40

EXHIBIT B

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Agner vs. Elwood Staffing Services, Inc. (PAGA)

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
4/16/2025	U.S. Postmaster	Postage	\$30.00
6/25/2025	U.S. Postmaster	Postage	\$19.84
6/25/2025	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
9/2/2025	Legal Document Server, Inc.	Attorney Service	\$48.93
9/2/2025	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
9/10/2025	Los Angeles Superior Court	Document Download Fee	\$2.00
9/11/2025	Los Angeles Superior Court	Document Download Fee	\$40.40
10/7/2025	Elite Litigation Support	Attorney Service	\$154.50
10/10/2025	Elite Litigation Support	Attorney Service	\$344.00
10/28/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
11/18/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
1/28/2026	Anderton Mediation	Mediation Fee	\$6,000.00
4/30/2026	Berger Consulting Group, LLC	Data Analysis	\$6,602.50
Total:			<u>\$13,789.57</u>