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on behalf of herself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

YAHAIRA ZELAYA, an individual on behalf of herself and all others similarly situated, Plaintiff, vs. HYDRO SYSTEMS, INC, a California corporation; and DOES 1 through 50, inclusive, Defendants.	Case No. 22STCV38300 CLASS ACTION Assigned for all purposes to: Hon. William F. Highberger Dept.: 10 **DECLARATION OF DAVID YEREMIAN IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** Final Approval Hearing: Date: November 5, 2026 Time: 11:00 a.m. Dept: 10

DECLARATION OF DAVID YEREMIAN

I, David Yeremian, declare as follows:

1. I am an attorney licensed and admitted to practice before all courts of the State of California, the United States District Court for the Central, Southern, Eastern, and Northern Districts of California, and the Ninth Circuit Court of Appeals. I am the managing attorney of David Yeremian & Associates, Inc., counsel for Plaintiff Yahaira Zelaya (hereinafter, "Plaintiff"), on behalf of themselves and all other similarly situated employees of Defendant Hydro Systems, Inc. ("Defendant") (collectively, "the Parties"). Natalie Haritoonian, Enoch J. Kim, Jonas Agle, and Matthew Carraher of D.Law, Inc., Sahag Majarian of Majarian Law Group, APC and I are referred to herein as Class Counsel.

2. All of the matters set forth herein are within my personal knowledge. I have represented Plaintiff and the putative Class since the inception of this matter. I submit this Declaration in support of the Motion for Final Approval, filed by Plaintiff, of the Parties' Class Action and PAGA Settlement Agreement ("Settlement Agreement"), a true and correct copy of which is attached to the Declaration of Enoch J. Kim as **Exhibit 1**.

QUALIFICATIONS AND ADEQUACY OF CLASS COUNSEL

3. My firm is well-qualified because of our experience, knowledge, and resources to act as counsel and represent Plaintiff and the putative Class in this action. My practice is exclusively focused on employment matters, with a substantial percentage devoted to litigating wage, hour, and working conditions violations on a class-wide basis.

4. I graduated from UC Berkeley in 1997 and received my law degree and MBA from UCLA in 2001. I am a member of the Los Angeles County Bar Association. I have been honored as a Super Lawyers Rising Star in 2009, 2010, 2012-2015. I have been named and honored as a Super Lawyer.

5. I have been practicing law since 2003. Since 2007, I have focused exclusively on representing employees, including in wage-and-hour class actions. During my career, I have represented employees in hundreds of wage-and-hour class action lawsuits as lead or co-lead counsel (including in the Central, Southern, Eastern, and Northern Districts of California), and I

have obtained six and seven-figure settlements against a range of Defendants, including Fortune 500 companies. These cases have involved the gamut of wage-and-hour claims, including claims for failure to pay minimum wages, unpaid wages and overtime, failure to provide meal and rest breaks, failure to reimburse necessary business expenses, inaccurate pay statements, failure to pay timely wages—similar to claims at issue in the present matter.

6. I am experienced in prosecuting employment matters, particularly class actions. In addition to the present case, I am also class counsel for dozens of other putative wage-and-hour class-action lawsuits pending in various state and federal jurisdictions throughout California.

7. My extensive experience in litigating employment wage and hour matters has been integral in identifying legal issues, evaluating the strengths and weaknesses of a case, and generally negotiating fair and reasonable class action settlements. Practice in the narrow field of wage and hour litigation requires skill and knowledge concerning the constantly evolving substantive law (state and federal), as well as the procedural law of class action litigation. In this action, I am fully equipped to use the skills and knowledge I have developed through more than a decade of prosecuting and defending wage and hour class actions to represent the interests of the Class fairly and adequately. Therefore, on account of my resources, experience, and knowledge, I am well qualified to act as Class Counsel and represent Plaintiff and the putative Class Members in this action.

8. In the last several years, I have had several contested class cases certified. When necessary, we pursue cases on appeal. Owing to my experience, I am well-qualified to evaluate the PAGA, and class claims in this action, to evaluate settlement v. trial and defenses raised. I have negotiated over 100 class action settlements, including many involving the same issues presented in this case. A selection of cases wherein I have served as lead or co-lead class counsel includes: *Galavis v. Patina Restaurant Group, LLC* (LASC BC375225; class size approx. 10,000; co-lead counsel); *Milford v. ADT Security Services, Inc.* (CACD CV08-2236; class size approx. 2,000; lead counsel); *Carreon v. Wolfgang Puck Catering and Events, LLC* (LASC BC398569; class size approx. 1,400; lead counsel); *Fluke v. RFG Oil, Inc.* (LASC BC403354; class size approx. 1,400; lead counsel); *Urena v. Camachos Restaurant* (LASC BC365913; class size approx. 887; lead

counsel); *Smith v. Rio Rancho Pontiac GMC Buick Inc.* (LASC BC391187; class size approx. 860; lead counsel); *Callela v. Dolce Group* (LASC BC364711; class size approx. 600; lead counsel); *Vasquez v. The Hollywood Pig n Whistle LP* (LASC BC335075; class size approx. 600; lead counsel); *Goldman v. Aorta Restaurant Operating LP* (LASC BC379688; class size approx. 300; lead counsel); *Sink-Crilly v. Centex Homes* (CACD CV09-2476; class size approx. 250; lead counsel); *Utley v. Cranbrook Partners Inc.* (LASC BC392813; class size approx. 200; lead counsel); *Garcia v. California Credits Group* (LASC BC353213; class size approx. 160; lead counsel); *Afanasyev v. Miller Infiniti, Inc.* (LASC BC350788; class size approx. 160; lead counsel); *Morris v. Gymboree, Inc.* (LASC BC393270; class size approx. 150; lead counsel); *Ortega v. AJC Sandblasting, Inc.* (LASC BC378806; class size approx. 140; lead counsel); *Lulejyan v. Jim Falk Motors of Beverly Hills, Inc.* (LASC BC398459; class size approx. 72; lead counsel); *Rylko v. The Griddle Café, Inc.* (LASC BC386126; class size approx. 70; lead counsel); *Healy v. Siemens IT Solutions and Services, Inc.* (Santa Clara Superior Court 108CV113479; class size approx. 60; lead counsel).

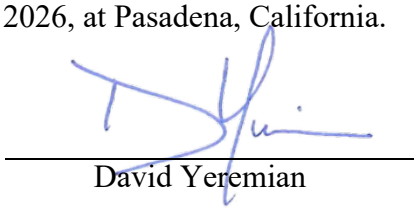
9. I graduated from UC Berkeley in 1997 and received his law degree and MBA from UCLA in 2001. I am a member of the Los Angeles County Bar Association and the California Employment Lawyers Association. I have been honored as a Super Lawyers Rising Star in 2009, 2010, 2012-2015. I have been named and honored as a Super Lawyer since 2016. In addition to the present case, I am also class or PAGA counsel for other wage-and-hour class-action lawsuits pending in various counties throughout California (including in federal courts). Throughout the course of this litigation, I estimate that I have spent at least 14.3 hours litigating this matter. Given my experience, the focus of my practice in a highly specialized area of law, and my role as Managing Partner, my current hourly rate is $1,552.00 per hour. Accordingly, my lodestar in this matter is $22,193.60 (14.3 x $1,552.00 = $22,193.60).

10. I do not believe that I have any conflicts of interest with the Class or with the Class Representative, Yahaira Zelaya. I am not related to the Class Representative. I have not previously represented Defendant in any matter. I respectfully submit that I and my colleagues at D.Law, Inc. are well suited to serve as Class Counsel in this action, and we have represented and will continue

to vigorously represent the interests of the Class Members and Aggrieved Employees.

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

Executed this 14th day of October 2026, at Pasadena, California.



David Yeremian