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on behalf of themselves 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.: SS-10 **DECLARATION OF SAHAG MAJARIAN II IN SUPPORT OF MOTION FOR FINAL APPROVAL OF THE CLASS ACTION SETTLEMENT** Date: November 5, 2026 Time: 11:00 AM Dept: 10

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DECLARATION OF SAHAG MAJARIAN II

I, SAHAG MAJARIAN II, hereby declare:

1. I am an attorney duly licensed to practice in the State of California and am one of the attorneys at Majarian Law Group, APC, co-counsel to Plaintiff Yahaira Zelaya in this action against Hydro Systems, Inc. I have personal knowledge of the following, and if called and sworn as a witness, I could and would competently testify thereto. This declaration is made in support of final approval of the class and PAGA representative action settlement in this case.

2. I graduated from Loyola Law School in 1990. Since my graduation, I have been in private practice primarily representing consumers against insurance companies and workers against their employers. I have devoted a significant portion of my practice to employment law and class actions, and have been appointed co-class counsel for the plaintiffs in no less than 300 wage and hour class actions. A sample of these cases are: *Ayvazi v. Ralph Grocery Company,* LASC Case No. BC 382980; *Sandoval vs. Chevron Stations, Inc.,* MCSC Case No. CV061690; *Nieves v. Roy's Worldwide, Inc.,* OCSC Case No. 06CC0076; *Corado v. Good Year Rubber Corp.,* SBSC Case No. RCV095476; *Pleitez v. Johnson Controls,* LASC Case No. BC353315; *Serrano v. BC/ Coca Cola Bottling Co. of L.A.,* LASC Case No. BC349904; *Urbina v. Valley Crest Co.,* LASC Case No. BC356023; *Moraza v. OK International,* OCSC Case No. 06CC0148; *Deluna v. Target,* LASC Case No. BC353080; *Daglian v. Staples, Inc.,* LASC Case No. BC375325; *McCoy v. Kimko,* OCSC Case No. 07CC00007; *Ayvazi v. Ralphs Grocery Company,* LASC Case No. BC382980; *Razo v. C & D Zodiac, Inc.,* OCSC Case No 07-CC01373; Sandoval v. Chevron Stations, Inc. MCSC Case No. CV061690; and *Gomez v. Spenuzza, Inc.* et al, RCSC Case No RIC524075.

3. In the employment class action arena, I have participated in over 300 class and/or PAGA action mediations. My participation has included extensive preparation, development of

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thorough knowledge of the legal issues related to certification and liability, and full immersion and participation in the mediation and negotiation process. I have also been designated co-class counsel in various cases where we prevailed in contested class certification motions. These cases include *Herrera v. Mountain Meadow Mushroom Farms, Inc.*, SDCSC Case No. 37-2009-00092416- CU-MT-CTI; *Aguirre v. California Drop Forge, Inc.*, LASC Case No. BC374521; *Marroquin v. Swissport North America, Inc.*, LASC Case No. BC390001; and *Romero v. Hydraulics International, Inc.*, LASC Case No. 19STCV04463.

4. Throughout my thirty-six year career in law, my practice has been exclusively contingent fee work. Within the class action arena, I have been designated co-class counsel in no less than 30 class actions that have settled for over $1 million each. Given my success and experience, in my contingent fee practice I have averaged over $900 per hour worked. Therefore, I believe it is appropriate to set my lodestar at $900 per hour in this case. This request is fair in view of the much higher rate per hour that can be justified by the broadly accepted Laffey Matrix which shows an hourly rate of $1,227 for attorneys out of law school for more than 20 years.

5. My firm's involvement in this case has included legal research, investigation, communication with client and co-counsel and coordination of efforts in litigation. This case was resolved after multiple months of negotiation after a failed mediation with an experienced and well-respected mediator Jason Marsili. Based upon the totality of circumstances, I believe that the result achieved in this case is an extremely good outcome for all class members and aggrieved employees.

6. Majarian Law Group, APC was approached by Plaintiff Yahaira Zelaya in November of 2022 in connection with potential employment law claims she believed she had against Defendants. After investigating the facts and analysis of the records, our co-counsel

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David Yeremian of David Yeremian & Associates and Majarian Law Group, APC proceeded with the filing of a class and PAGA action against Defendants.

7. Based on my experience as class and PAGA counsel in other employment cases and given the legal and factual realities presented in this case, I believe the proposed settlement is fair, reasonable and adequate for the impacted and aggrieved employees

8. Throughout my handling of this case, I have spent a total of 18.70 hours in this case. Based upon my rate of $900 per hour, my unadjusted lodestar amounts to $16,830. I anticipate spending an additional 3 hours on this case to final conclusion and closure of the case.

9. Our office has incurred costs in the total sum of $1,885.95 details of which are attached hereto as Exhibit "A".

I declare under the penalty of perjury under the laws of the State of California the foregoing is true

and correct and this declaration is executed October 13, 2026 in Tarzana, California.

DocuSigned by:
Sahag Majarian
3142D9828E6E4A2...

SAHAG MAJARIAN II

EXHIBIT "A"

Majarian Law Group, APC								
Zelaya v. Hydro Systems (File # 30061- YL)								
Type	Payment Method	Date	Num	Source Name	Invoice	Invoice Date	Memo	Amount
Case Anywhere								
	Credit Card	7/5/2023		Case Anywhere	294908	7/3/2023	System Access Fee	$130.95
	Credit Card	10/6/2023		Case Anywhere	304454	10/5/2023	System Access Fee	$135.00
	Credit Card	1/8/2024		Case Anywhere	314399	1/5/2024	System Access Fee	$135.00
	Credit Card	4/3/2024		Case Anywhere	324587	4/2/2024	System Access Fee	$135.00
	Credit Card	7/3/2024		Case Anywhere	335530	7/2/2024	System Access Fee	$135.00
	Credit Card	12/6/2024		Case Anywhere	346977	10/4/2024	System Access Fee	$135.00
	Credit Card	1/22/2025		Case Anywhere	358868	1/9/2025	System Access Fee	$135.00
	Credit Card	3/10/2025		Case Anywhere	366850	2/5/2025	System Access Fee	$45.00
	Credit Card	3/10/2025		Case Anywhere	376711	3/5/2025	System Access Fee	$45.00
	Credit Card	4/7/2025		Case Anywhere	390543	4/4/2025	System Access Fee	$45.00
	Credit Card	5/6/2025		Case Anywhere	402486	5/2/2025	System Access Fee	$45.00
	Credit Card	6/5/2025		Case Anywhere	414605	6/2/2025	System Access Fee	$45.00
	Credit Card	7/2/2025		Case Anywhere	427058	7/1/2025	System Access Fee	$45.00
	Credit Card	8/11/2025		Case Anywhere	439569	8/4/2025	System Access Fee	$45.00
	Credit Card	9/3/2025		Case Anywhere	452172	9/2/2025	System Access Fee	$45.00
	Credit Card	10/2/2025		Case Anywhere	464943	10/1/2025	System Access Fee	$45.00
	Credit Card	11/4/2025		Case Anywhere	477916	11/3/2025	System Access Fee	$45.00
	Credit Card	12/2/2025		Case Anywhere	490715	12/1/2025	System Access Fee	$45.00
	Credit Card	1/6/2026		Case Anywhere	503697	1/2/2026	System Access Fee	$45.00
	Credit Card	2/3/2026		Case Anywhere	516998	2/2/2026	System Access Fee	$45.00
	Credit Card	3/5/2026		Case Anywhere	530317	3/2/2026	System Access Fee	$45.00
	Credit Card	4/7/2026		Case Anywhere	543812	4/1/2026	System Access Fee	$45.00
	Credit Card	5/4/2026		Case Anywhere	557287	5/1/2026	System Access Fee	$45.00
	Credit Card	6/3/2026		Case Anywhere	570593	6/1/2026	System Access Fee	$45.00
	Credit Card	7/2/2026		Case Anywhere	583821	7/1/2026	System Access Fee	$45.00
	Credit Card	8/10/2026		Case Anywhere	597119	8/1/2026	System Access Fee	$45.00
	Credit Card	9/2/2026		Case Anywhere	610489	9/1/2026	System Access Fee	$45.00
	Credit Card	10/2/2026		Case Anywhere	623858	10/1/2026	System Access Fee	$45.00
TOTAL COSTS								$1,885.95