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Attorneys for Plaintiff MARK A. FLETCHER,
an individual on behalf of himself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN FRANCISCO

MARK A. FLETCHER, an individual, on
behalf of himself and others similarly situated,

Plaintiff,

vs.

HEBREW HOME FOR AGED DISABLED,
a California nonprofit corporation; SAN
FRANCISCO CAMPUS FOR JEWISH
LIVING, a California entity form unknown;
JEWISH HOME AND SENIOR LIVING
FOUNDATION, a California nonprofit
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: CGC-23-603795

CLASS ACTION

Assigned for All Purposes To:
Honorable Jeffrey S. Ross
Department 606

**DECLARATION OF DAVID YEREMIAN
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF JOINT STIPULATION OF
CLASS AND PAGA ACTION
SETTLEMENT AGREEMENT,
ATTORNEYS' FEES AND EXPENSES,
AND SERVICE AWARD**

Date: September 25, 2023
Time: 10:00 a.m.
Dept.: 606

Original Complaint Filed: January 4, 2023
First Amended Complaint Filed: March 9, 2023
Trial Date: None Set

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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. and co-counsel along with D.Law, Inc. for plaintiff Mark A. Fletcher (“Plaintiff”), on behalf of himself and all other similarly situated employees of defendants Hebrew Home for Aged Disabled, San Francisco Campus for Jewish Living, and Jewish Home and Senior Living Foundation. (“Defendants”).
2. All of the matters set forth herein are within my personal knowledge. I have represented Plaintiff since the inception of this matter. I submit this Declaration in support of Plaintiff’s Motion for Final Approval of the Parties’ Joint Stipulation of Class and PAGA Action Settlement Agreement, Attorneys’ Fees and Expenses, and Service Award (“Motion”). Plaintiff’s counsel is herein referred to as Class Counsel.

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1 companies. These cases have involved the gamut of wage-and-hour claims, including claims for
2 failure to pay minimum wages, unpaid wages and overtime, failure to provide meal and rest breaks,
3 failure to reimburse necessary business expenses, inaccurate pay statements, and failure to pay
4 timely wages—similar to claims at issue in the present matter.

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

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

17 8. In the last several years, I have had several contested class cases certified. When
18 necessary, we pursue cases on appeal. Owing to my experience, I am well-qualified to assess the
19 PAGA and class claims in this action, evaluate the potential for settlement versus trial, and analyze
20 the defenses raised. I have negotiated over 100 class action settlements, including many involving
21 the same issues presented in this case. A selection of cases wherein I have served as lead or co-lead
22 class counsel includes: *Galavis v. Patina Restaurant Group, LLC* (LASC BC375225; class size
23 approx. 10,000; co-lead counsel); *Milford v. ADT Security Services, Inc.* (CACD CV08-2236; class
24 size approx. 2,000; lead counsel); *Carreon v. Wolfgang Puck Catering and Events, LLC* (LASC
25 BC398569; class size approx. 1,400; lead counsel); *Fluke v. RFG Oil, Inc.* (LASC BC403354; class
26 size approx. 1,400; lead counsel); *Urena v. Camachos Restaurant* (LASC BC365913; class size
27 approx. 887; lead counsel); *Smith v. Rio Rancho Pontiac GMC Buick Inc.* (LASC BC391187; class
28 size approx. 860; lead counsel); *Callela v. Dolce Group* (LASC BC364711; class size approx. 600;

1 lead counsel); *Vasquez v. The Hollywood Pig n Whistle LP* (LASC BC335075; class size approx.
2 600; lead counsel); *Goldman v. Aorta Restaurant Operating LP* (LASC BC379688; class size
3 approx. 300; lead counsel); *Sink-Crilly v. Centex Homes* (CACD CV09-2476; class size approx.
4 250; lead counsel); *Utley v. Cranbrook Partners Inc.* (LASC BC392813; class size approx. 200;
5 lead counsel); *Garcia v. California Credits Group* (LASC BC353213; class size approx. 160; lead
6 counsel); *Afanasyev v. Miller Infiniti, Inc.* (LASC BC350788; class size approx. 160; lead counsel);
7 *Morris v. Gymboree, Inc.* (LASC BC393270; class size approx. 150; lead counsel); *Ortega v. AJC*
8 *Sandblasting, Inc.* (LASC BC378806; class size approx. 140; lead counsel); *Lulejyan v. Jim Falk*
9 *Motors of Beverly Hills, Inc.* (LASC BC398459; class size approx. 72; lead counsel); *Rylko v. The*
10 *Griddle Café, Inc.* (LASC BC386126; class size approx. 70; lead counsel); *Healy v. Siemens IT*
11 *Solutions and Services, Inc.* (Santa Clara Superior Court 108CV113479; class size approx. 60; lead
12 counsel).

13 **REQUEST FOR ATTORNEYS' FEES**

14 9. I have been involved in this action from its inception and have dedicated at least **4.0**
15 hours of my attorney time to it to date. I anticipate incurring additional hours in connection with
16 settlement funding and disbursement. My current hourly rate is \$1,375, which is based on my years
17 of experience in a highly specialized area of law and is in line with the Laffey Matrix (24 years out
18 of law school, adjusted Laffey Matrix rate of \$1,282.48 for the San Francisco locality). While this
19 rate is higher than the Laffey Matrix rate, Laffey Matrix rates are not a ceiling on the hourly rates
20 of an attorney in the locality. Accordingly, I have incurred approximately **\$5,500.00** in attorneys'
21 fees for the firm for my work on this action to date. For the Court's consideration of my hours and
22 fees in the lodestar cross-check, please see the contemporaneous time records attached as **Exhibit 1**
23 to the Declaration of Enoch J. Kim ("Kim Decl.") detailing the hours I have invested in litigating
24 this action and some of the major tasks I have performed broken down chronologically.

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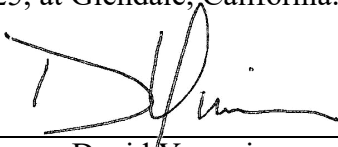
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1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct.

3 Executed this 4th day of September 2025, at Glendale, California.

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6 David Yerman
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