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Attorneys for Plaintiff Chantha Svay, individually, and
on behalf of all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MADERA**

CHANTHA SVAY, individually, and on behalf
of all others similarly situated,

Plaintiff,

v.

CERTAINTIED, LLC, a limited liability
corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: MCV093066

**CLASS AND REPRESENTATIVE
ACTION**

*[Assigned for all purposes to:
Hon. Michael J. Jurkovich, Dept. 44]*

**DECLARATION OF JOHN G. YSLAS IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: January 16, 2025
Time: 8:30 a.m.
Dept.: 44

1 I, John G. Yslas, hereby declare as follows:

2 1. I am an attorney at law licensed to practice before all of the courts of the State of
3 California. I am a senior partner at Wilshire Law Firm, PLC (“WLF”), counsel for Plaintiff Chantha
4 Svay (“Plaintiff”) in this matter. I am thoroughly familiar with and have personal knowledge of all
5 of the facts set forth herein.

6 2. I submit this declaration in support of Plaintiff’s Motion for Preliminary Approval
7 of Class Action and PAGA Settlement.

8 **Plaintiff’s Counsel’s Qualifications**

9 3. Plaintiff is represented by WLF. The attorneys at WLF performed significant work
10 and expended litigation costs in prosecuting this matter with no guarantee of payment.

11 4. WLF was selected by Best Lawyers and U.S. News & World Report as one of the
12 nation’s Best Law Firms since 2020 and is comprised of more than 100 attorneys and over 600
13 employees. WLF is actively and continuously practicing in employment litigation, representing
14 employees in both individual and class actions in both state and federal courts throughout
15 California.

16 5. WLF is qualified to handle this Litigation because its attorneys are experienced in
17 litigating Labor Code violations in both individual, class action, and representative action cases.
18 WLF has handled, and is currently handling, numerous wage and hour class action lawsuits, as
19 well as class actions involving consumer rights and data privacy litigation.

20 6. I graduated from the University of California, Santa Barbara with High Honors in
21 1991 with Bachelor of Arts degrees in Psychology. I received my Juris Doctor from UCLA Law
22 School in 1996.

23 7. Upon graduating from law school in 1996, I worked for a boutique law firm
24 practicing general litigation which included employment law matters. Since 2000 (that is, the last
25 23 years) my practice has been exclusively focused on labor and employment matters including
26 handling wage and hour class, collective and representative actions (including the California
27 Private Attorneys General Act, or “PAGA”), including in the international law firms of Morgan,
28 Lewis & Bockius LLP (where I was a senior associate), Foley & Lardner LLP (where I was a

1 partner and a national Vice Chair of the Labor and Employment Group), Norton Rose Fulbright
2 LLP (where I was a partner) and Seyfarth Shaw (where I was a partner and member of the Wage
3 and Hour Practice Group). During my time at these law firms, I was the primary attorney or took
4 a major leading role in defending employers on numerous wage and hour class, collective and
5 representative actions.

6 8. In late June 2022 I left Seyfarth Shaw and joined my current firm, The Wilshire
7 Law Firm, PLC, to represent plaintiff employees. I have been and am handling many wage and
8 hour class and representative actions litigating such matters on behalf of plaintiff employees in
9 numerous Superior Courts and District Courts. From matters representing both plaintiffs and
10 defendants, I have successfully mediated the resolution of many wage and hour class, collective,
11 and representative actions. Just since starting to settle cases in late April 2023 I have already
12 successfully mediated matters in which I have been counsel or co-counsel resulting in more than
13 \$75 million in settlements which are in the process of being finalized, and with numerous upcoming
14 mediations scheduled. In those and numerous other matters, I have managed and assisted with the
15 litigation and settlement of many wage and hour PAGA and class actions. In those actions, I
16 performed similar tasks as those performed in the course of prosecuting this action.

17 9. I have received numerous awards for my legal work. For example, from 2015 to
18 2018, I was listed in Los Angeles Super Lawyers for Employment Litigation (Thomson Reuters).
19 have also served on numerous prominent boards and in other leadership positions, including
20 currently serving as Southern California Regional President for the Hispanic National Bar
21 Association and on the board of directors of the Mexican American Bar Foundation. I also
22 previously served on the 5-member Los Angeles Civil Service Commission, which generally
23 oversees the personnel decisions for the City of Angeles.

24 10. I have also published numerous blogs on labor and employment issues including on
25 wage and hour issues. For example, I published “Headline News: Wal-Mart v. Dukes-Impact on
26 Class Action Litigation” (while a partner with Foley & Lardner LLP) and “Are You Really
27 Protected From Wage-and-Hour Successor Liability in an Asset Purchase” (while a partner with
28 Seyfarth Shaw LLP). I have also been a presenter at numerous conferences, including being a

1 presenter involving the “Employment Law Update” at a National Employment Law Council
2 conference.

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

5 Executed on December 23, 2024 at Los Angeles, California.

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John G. Yslas

PROOF OF SERVICE

Svay v. Certainteed, LLC, et al.
MCV093066

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, Rebecca Padilla, state that I am employed in the aforesaid County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 3055 Wilshire Blvd., 12th Floor, Los Angeles, California 90010. My electronic service address is rebecca.padilla@wilshirelawfirm.com.

On December 23, 2024, I served the **DECLARATION OF JOHN G. YSLAS IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**, on the interested parties by placing a true copy thereof, enclosed in a sealed envelope by following one of the methods of service as follows:

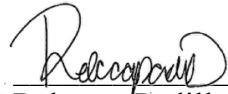
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Attorneys for Defendant

(X) **BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known email address or e-mail of record in this action.

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

Executed on December 23, 2024, at Los Angeles, California.



Rebecca Padilla