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Superior Court of California
County of Fresno
By: Jonathan Maddon, Deputy

Attorneys for Plaintiff Juan Pablo Ramirez Pelayo, individually,
and on behalf of all others similarly situated

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

JUAN PABLO RAMIREZ PELAYO,
individually, and on behalf of all others similarly
situated,

Plaintiff,

v.

NATIONS ROOF WEST, LLC, a Delaware
limited liability company,

Defendants.

Case No. 23CECG01236

*Assigned for all purposes to:
Hon. Kristi Culver Kapetan
Dept. 502*

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

Date: July 16, 2025
Time: 3:27 p.m.
Dept.: 502

Complaint Filed: April 3, 2023
FAC Filed: June 17, 2024

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 Juan
4 Pablo Ramirez Pelayo (“Plaintiff”) in this matter. I am thoroughly familiar with and have personal
5 knowledge of all of the facts set forth herein.

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

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

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

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

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

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

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

5 8. In late June 2022 I left Seyfarth Shaw LLP and joined my current firm, Wilshire
6 Law Firm, PLC, to represent plaintiff employees. I have been and am handling many wage and
7 hour class and representative actions litigating such matters on behalf of plaintiff employees in
8 numerous Superior Courts and District Courts. From matters representing both plaintiffs and
9 defendants, I have successfully mediated the resolution of many wage and hour class, collective,
10 and representative actions. Just since starting to settle cases in late April 2023 I have already
11 successfully mediated matters in which I have been counsel or co-counsel resulting in **over \$125**
12 **million** in settlements which are in the process of being finalized, and with numerous upcoming
13 mediations scheduled. In those and numerous other matters, I have managed and assisted with the
14 litigation and settlement of many wage and hour PAGA and class actions. In those actions, I
15 performed similar tasks as those performed in the course of prosecuting this action.

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

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

1 conference. I currently bill at an hourly rate of \$1,500.00. This hourly rate is reasonable given my
2 years of experience in this practice area and is the usual hourly rate charged for my services.
3 Although I currently bill at \$1,500.00 an hour, I am basing my billing rate for this matter on that
4 which was approved at preliminary approval, an hourly rate of \$850.00.

5 11. Diego Aviles is a ninth-year senior attorney at Wilshire Law Firm, PLC. He
6 graduated with Bachelor of Arts degrees in criminology, law and society and political science from
7 University of California at Irvine in 2011. He attended and graduated from Santa Clara University
8 School of Law in 2017. He was admitted to practice law the California in 2017. Since 2017, Mr.
9 Aviles has worked in the specialize field of plaintiff-side wage and hour class actions and PAGA
10 actions. He is also an active member of the California Employment Lawyers Association
11 (“CELA”). Although Mr. Aviles currently bills at \$700.00 an hour, his billing rate for this matter
12 is based on that which was approved at preliminary approval, an hourly rate of \$650.00.

13 12. Harry Erganyan is an Associate Attorney at Wilshire Law Firm, PLC. He was
14 admitted to practice law in the State of California in 2021. Harry graduated from Loyola
15 Marymount University, with a Bachelor of Arts in Political Science. He received his Juris Doctor
16 from Southwestern Law School. During law school, he externed for the Los Angeles City Attorney.
17 Since January 2021, his practice has mainly been focused on wage and hour class action litigation.
18 Although Mr. Erganyan currently bills at \$600.00 an hour, his billing rate for this matter is based
19 on that which was approved at preliminary approval, an hourly rate of \$550.00.

20 13. Mariam Nazarentyan is an Associate Attorney at Wilshire Law Firm, PLC. She
21 graduated with Bachelor of Arts degrees in Political Science and Government from Layola
22 Marymount University in 2016. She attended and graduated from Southwestern Law School in
23 2020. She was admitted to practice law the California in 2021. She is also an active member of the
24 California Employment Lawyers Association (“CELA”). Although Ms. Nazarentyan currently
25 bills at \$500.00 an hour, her billing rate for this matter is based on that which was approved at
26 preliminary approval, an hourly rate of \$450.00.

27 14. John Brown is an Associate Attorney at Wilshire Law firm, PLC. He was admitted
28 to practice law in the State of California in 2004. John graduated from UC Berkeley with a Bachelor

of Arts and received his Juris Doctor from The UCLA School of Law. His current practice has been focused on class action employment law. He has participated in dozens of settlements totaling tens of millions of dollars, from the memorandum of understanding and settlement agreement drafting stage through to final approvals from the court. Although Mr. Brown currently bills at \$500.00 an hour, his billing rate for this matter is based on that which was approved at preliminary approval, an hourly rate of \$450.00.

15. Lisa B. Iturriaga is an Associate Attorney at Wilshire Law Firm, PLC. She was admitted to practice law in the State of California in November 2021. Lisa graduated from University of South Florida with a Bachelor of Science in Finance and a Bachelor of Arts in Marketing. She received her Juris Doctor from Chapman University Dale E. Fowler School of Law. Since graduating, her practice has been in insurance defense (previously) and employment law (currently). Since 2023, she has exclusively worked on Plaintiff-side wage and hour cases. Although Ms. Iturriaga currently bills at \$500.00 an hour, her billing rate for this matter will coincide with that which was approved at preliminary approval for her colleagues with similar experience, an hourly rate of \$450.00.

16. WLF's hourly rates are comparable to those charged by other class action plaintiffs' counsel and the firms defending class actions. WLF's hourly rates have been approved by other courts in California. *See, e.g., Matthew Veliz v. DrinkPak, LLC*, Los Angeles County Superior Court Case No. 22STCV37384, *Ismael Villegas-Sanchez v. COE Orchard Equipment, Inc.*, Sutter County Superior Court Case No. CVCS22-0002261; *Jessica Bronsal v. PTI Technologies Inc.*, Ventura County Superior Court Case No. 202200570361CUOE; *Miguel A. Vigil Ruiz v. The De Ruosi Group, LLC*, San Joaquin County Superior Court Case No. STK-CV-UOE-2022-8780; *Gutierrez v. Top Drawer Merch, LLC et al.*, Los Angeles County Superior Court, Case No. 23STCV04299; *Wing v. Road Machinery, LLC et al.*, Kern County Superior Court, Case No. BCV-22-102896; *Hernandez v. SGPS Showrig Los Angeles, Inc.*, Los Angeles County Superior Court, Case No. 22STCV28155; *Azevedo v. Tulare Nursing & Rehabilitation Hospital, Inc.*, Tulare County Superior Court, Case No. VCU293325. The total hours expended on this action are reasonable and in line with comparable cases.

1 17. WLF has performed significant work and incurred litigation costs in prosecuting
2 this matter with no guarantee of any payment. The efforts expended by Plaintiff's counsel to
3 achieve this result include, but are not limited to, the following:

- 4 a. the investigation of the matter, including meeting with Plaintiff, reviewing
5 Defendant's policies, and requesting and reviewing Plaintiff's time and pay records,
6 personnel files, and exploring the corporate structure of Defendant;
- 7 b. filing the Action;
- 8 c. attending status conferences and meeting and conferring with Defendants regarding
9 the case;
- 10 d. remanding the Action from the United States District Court for the Eastern District
11 of California, Fresno Division to the Superior Court State of California, County of
12 Fresno;
- 13 e. filing the First Amended Complaint;
- 14 f. meeting and conferring with Defendant regarding mediation, exchange of informal
15 discovery beforehand, and negotiating with opposing counsel regarding the
16 parameters thereof;
- 17 g. selecting a mediator and mediation date;
- 18 h. working with opposing counsel and expert consultants for the receipt of a
19 representative sampling and analyzing the same with the aid of expert consultants
20 and Plaintiff to perform analyses of liability and exposure prior to attendance of the
21 mediation in this matter;
- 22 i. reviewing policy documents from Defendant and researching applicable defenses;
- 23 j. preparation of a mediation brief and damages model for use at mediation;
- 24 k. attendance at mediation;
- 25 l. communicating with Plaintiff who requested updates or other information regarding
26 this matter;
- 27 m. negotiating, finalizing and fully executing the initial settlement agreement;
- 28

- n. preparing and filing the Motion for Preliminary Approval and supporting documents;
- o. preparing and filing the supplemental Motion for Preliminary Approval and supporting documents pursuant to the Court's request;
- p. attending the hearings on Motion for Preliminary Approval;
- q. communicating with class members who sought additional information regarding the settlement, including answering questions regarding the settlement and obtaining updated addresses from class members for purposes of receiving the class notices and administering the settlement checks; and
- r. preparing the instant Motion for Final Approval and supporting documents.

18. WLF's current lodestar reflects the efficiencies achieved by attorneys experienced in this field with 369.5 hours of work resulting in \$237,555.00 in fees. WLF dedicated significant resources to this case by dividing the tasks required according to skill level. The hours expended by each attorney were not duplicative and reflect the extensive investigation and analysis that was required to achieve this Settlement. This amount does not include the time Class Counsel will spend at the final approval hearing and assisting the Settlement Administrator following final approval. The chart below shows the calculation of hours spent by each of WLF's attorneys on this case:

Attorney	Hours	Hourly Rate	Total
John G. Yslas	99.2	\$850.00	\$84,320.00
Diego Aviles	115.8	\$650.00	\$75,270.00
Harry Erganyan	84.4	\$550.00	\$46,420.00
Mariam M. Nazaretyan	30	\$450.00	\$13,500.00
John Brown	30.1	\$450.00	\$13,545.00
Lisa B. Iturriaga	10	\$450.00	\$4,500.00

19. The risk factors present in this case favor the application of a 1.03 multiplier. To begin, Class Counsel has singularly assumed the risk and costs of litigation purely on a contingency

1 basis. And, while Plaintiff is confident in the merits of his claims, a legitimate controversy exists
2 as to each cause of action posing an actual risk that Plaintiff may not succeed at class certification
3 and/or trial. Any of these obstacles could have prevented recovery completely, meaning Class
4 Counsel would have been left with no compensation for all the time and money invested in
5 litigating this case. Despite these risks, Class Counsel took this case on a contingency basis so that
6 Class Members (a particularly vulnerable group of hourly paid workers) could be compensated for
7 their unpaid wages. Consequently, Class Counsel was precluded from focusing on, or taking on,
8 other cases which could have resulted in a larger, and less risky, monetary gain. This time could
9 have been spent on other potentially lucrative cases.

10 20. In litigation costs, WLF has spent \$21,258.14 on items such as filing fees, service
11 fees, mediation fees, and expert fees.¹ True and correct copies of WLF's cost reports in this matter
12 are attached hereto as **Exhibit 1**. All of the costs incurred were reasonable and necessary for the
13 prosecution of this case. Since WLF's actual costs did not reach the \$25,000.00 cap set forth in the
14 Settlement, the remaining \$3,741.86 will revert to and increase the Net Settlement Amount.

15 21. Class Counsel has negotiated a settlement here that they believe is fair, reasonable,
16 and adequate based on their prior experience litigating these types of cases.

17 22. To date, the LWDA has not responded to or objected to the Settlement in this matter.

18 I declare under penalty of perjury under the laws of the State of California that the foregoing
19 is true and correct. Executed on June 23, 2025 at Los Angeles, California.

20
21 
22 John G. Yslas
23
24
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26
27 ¹ WLF's final cost request of \$21,258.14 excludes costs from the State Bar of California for
28 \$25.00, \$0.63, Pacer for \$21.00, Thomson Reuters Westlaw for \$2.40, \$59.61, \$24.34,
\$340.89 and \$47.53, and Postage for \$0.88 and \$1.26 as shown in WLF's cost reports attached
as **Exhibit 1**.

EXHIBIT 1

06/19/25

Wilshire Law Firm, PLC
Client Costs Detailed Report

Accrual Basis

All Transactions

Type	Date	Num	Class	Source Name	Memo	Amount	Balance
500000 · COS							
501500 · Court Filing Fees							
Credi...	04/06/2023		NationsRoofWest(Ram...	One Legal LLC	20128769-SUM&COM-Atty Svc for Court Filing-2...	1,494.53	1,494.53
Credi...	07/05/2023		NationsRoofWest(Ram...	US District Court CA	RM Attorney Admission for Andrew Sandoval (24...	200.00	1,694.53
Bill	06/12/2023	60209	NationsRoofWest(Ram...	Valpro Attorney Servic...	60209-NationsRoofWest(Ramirez).W&H-File POS	45.00	1,739.53
Credi...	07/17/2024	23329898	NationsRoofWest(Ram...	One Legal LLC	23329898-240009-Atty Svc for Court Filing-Motio...	88.23	1,827.76
Credi...	07/31/2024	23423921	NationsRoofWest(Ram...	One Legal LLC	23423921-Atty Svc for Court Filing-Notice-Nation...	27.33	1,855.09
Credi...	08/05/2024	23455218	NationsRoofWest(Ram...	One Legal LLC	23455218-240009-Atty Svc for Court Filing-Notic...	25.27	1,880.36
Credi...	11/26/2024	24166978	NationsRoofWest(Ram...	One Legal LLC	24166978-240009-Atty Svc for Court Filing-Decla...	90.55	1,970.91
Credi...	12/09/2024	24283417	NationsRoofWest(Ram...	One Legal LLC	24283417-240009-Atty Svc for Court Filing-No,Pr...	20.34	1,991.25
Total 501500 · Court Filing Fees						1,991.25	1,991.25
502500 · Legal Expenses							
Credi...	04/01/2023		NationsRoofWest(Ram...	Department of Industri...	ORD-000215749 NationsRoofWest(Ramirez).W&...	75.00	75.00
Credi...	06/26/2023		NationsRoofWest(Ram...	State Bar of California	RM Certificate of Standing for Andrew Sandoval -...	25.00	100.00
Credi...	06/26/2023		NationsRoofWest(Ram...	State Bar of California	RM Certificate of Standing for Andrew Sandoval -...	0.63	100.63
Credi...	10/29/2024		NationsRoofWest(Ram...	Pacer	RM 5957820-Q22024	21.00	121.63
Bill	08/17/2023	50265	NationsRoofWest(Ram...	Signature Resolution, ...	50265-NationsRoofWest(Ramirez).W&H-50% Me...	7,450.00	7,571.63
Bill	03/06/2023	847939906	NationsRoofWest(Ram...	Thomson Reuters-Wes...	Legal Research-NationsRoofWest(Ramirez).W&H	2.40	7,574.03
Bill	08/04/2023	848737597	NationsRoofWest(Ram...	Thomson Reuters-Wes...	Legal Research-NationsRoofWest(Ramirez).W&H	59.61	7,633.64
Bill	08/04/2023	848737597	NationsRoofWest(Ram...	Thomson Reuters-Wes...	Legal Research-NationsRoofWest(Ramirez).W&H	24.34	7,657.98
Bill	09/03/2024	850711723	NationsRoofWest(Ram...	Thomson Reuters-Wes...	Legal Research-NationsRoofWest(Ramirez).W&H	340.89	7,998.87
Bill	12/04/2024	851148941	NationsRoofWest(Ram...	Thomson Reuters-Wes...	Legal Research-NationsRoofWest(Ramirez).W&H	47.53	8,046.40
Total 502500 · Legal Expenses						8,046.40	8,046.40
503200 · Process Service Fees							
Bill	06/09/2023	60196	NationsRoofWest(Ram...	Valpro Attorney Servic...	60196-NationsRoofWest(Ramirez).W&H Servee:...	143.00	143.00
Bill	09/23/2024	81367	NationsRoofWest(Ram...	Valpro Attorney Servic...	81367-NationsRoofWest(Ramirez).W&H-Servee ...	160.00	303.00
Total 503200 · Process Service Fees						303.00	303.00
503300 · Professional Fees							
Bill	01/31/2024	9632	NationsRoofWest(Ram...	Berger Consulting Gro...	9632-NationsRoofWest(Ramirez).W&H-6.8 hrs of...	3,060.00	3,060.00
Bill	02/29/2024	10876	NationsRoofWest(Ram...	Berger Consulting Gro...	10876-NationsRoofWest(Ramirez).W&H- 6.60 ho...	2,970.00	6,030.00
Bill	12/05/2024	13187	NationsRoofWest(Ram...	Berger Consulting Gro...	13187 NationsRoofWest(Ramirez).W&H 8.30 ho...	5,395.00	11,425.00
Total 503300 · Professional Fees						11,425.00	11,425.00
Total 500000 · COS						21,765.65	21,765.65
TOTAL						21,765.65	21,765.65

Expenses Subtotals - Filtered Exp. Type

As of 2025-06-19 13:32:43 Pacific Standard Time/PST • Generated by Arella Ramirez

Filtered By
Show: All matters
Matter: ID equals a0L5G00000Yzt3u
Expense Type equals E127 — DTF,DTF,E108 — Postage,E102 — Printing

Display Name ↑	Expense Type ↑	Date	Expense: Expense ID	Provider Name	Note	Amount	Reduction Amount	Amount Paid	Amount Due.
Juan Ramirez - Wage & Hour: 1/30/2023	DTF	2/8/2023	E-3126893		Docusign Envelope	\$1.89			\$1.89
	Subtotal	Sum				\$1.89	\$0.00	\$0.00	\$1.89
		Count	1						
	E102 — Printing	4/5/2023	E-3055880			\$0.75			\$0.75
		3/3/2023	E-3025757			\$11.25			\$11.25
	Subtotal	Sum				\$12.00	\$0.00	\$0.00	\$12.00
		Count	2						
	E108 — Postage	3/22/2024	E-3187889			\$0.88			\$0.88
		8/23/2023	E-3140344			\$1.26			\$1.26
	Subtotal	Sum				\$2.14	\$0.00	\$0.00	\$2.14
		Count	2						
	Subtotal	Sum				\$16.03	\$0.00	\$0.00	\$16.03
		Count	5						
Total		Sum				\$16.03	\$0.00	\$0.00	\$16.03
		Count	5						