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Attorneys for Plaintiffs Mayra Diaz and Robert Villareal
and Proposed Class Counsel

SUPERIOR COURT OF CALIFORNIA
FOR THE COUNTY OF TULARE

MAYRA DIAZ, on behalf of herself and on
behalf of all similarly situated individuals,

Plaintiff,

v.

KAWEAH DELTA HEALTH CARE
DISTRICT, a California public entity, and
DOES 1 through 10, inclusive,

Defendants.

CASE NO: VCU297155

*Assigned to the Honorable Bret D. Hillman,
Dept. 2*

CLASS ACTION

**DECLARATION OF JOSEPH
TOJARIEH IN SUPPORT OF
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF
CLASS AND REPRESENTATIVE
ACTION SETTLEMENT**

Date: October 22, 2024

Time: 8:30 a.m.

Dept.: 2

Action Filed: April 3, 2023

DECLARATION OF JOSEPH TOJARIEH

I, Joseph Tojarieh, am the attorney of record for Plaintiffs Mayra Diaz and Robert Villareal. I am duly licensed to practice law in the State of California and am in good standing before the California State Bar. I have personal knowledge of all the following facts stated in this declaration and if called as a witness, I could and would competently testify thereto under oath:

1. I graduated *summa cum laude* from the Honor's College of the University of California, Los Angeles (UCLA) with a Bachelor of Arts degree in Political Science and History. I subsequently received my Juris Doctor degree from Loyola Law School, Los Angeles, where I served as a staff member and Senior Note and Comment Editor of the Loyola Law School International Law Review.

2. I have been a practicing attorney for over 14 years.

3. I am duly licensed to practice before all state courts in California, all United States District Courts in California, all United States Bankruptcy Courts in California, and the United States Supreme Court. I am also an active member of the Consumer Attorneys Association of Los Angeles (CAALA) and California Employment Lawyers Association (CELA).

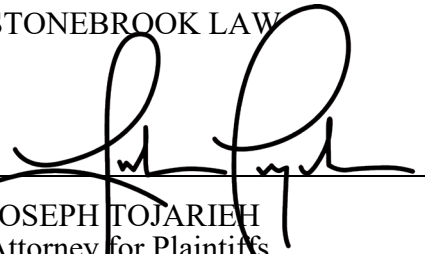
4. My practice has been devoted almost exclusively to employment litigation, including wage and hour class and representative actions. I have been appointed class counsel in numerous wage and hour class actions in California state and federal courts, including: *Mohorne v. Church & Dwight Co., Inc.* (LASC Case No. BC569117); *Lopez v. Aerotek, Inc.* (USDC CACD Case No. SACV 14-00803-CJC(JCGx)); *Silva v. ADJ Products* (LASC Case No. BC618581); *Hernandez v. Downey Wholesale, Inc.* (SBSC Case No. CIVDS1821370); *Walters v. Los Angeles County Fair* (SBSC Case No. CIVDS1825109); *Patton v. Midwest Construction Services, Inc.* (CACD Case No. 2:19-cv-08580-JFW-MAAx); *Fontenette v. Special Services for Groups, Inc.* (LASC Case No. 19STCV46726); *Basich-Mustafa v. Designer Fragrances & Cosmetics Company* (LASC Case No. 20STCV16314); *Miller v. Mountain High Reunited LLC* (SBSC Case No. CIVDS2010045); *Jones v. Peace Over Violence, et al.* (LASC Case No. 20STCV39038); *Tam v. Q Tech Corporation* (LASC Case No. 21STCV18635; *Ramirez v. Baxalta US, Inc.* (Los Angeles Superior Court Case No. 21STCV07572); *Celio v. Air*

1 *International US, Inc.* (Alameda Superior Court Case No. RG21098764); and *Hang v. Old*
2 *Dominion Freight Line, Inc.* (CACD Case No. 5:21-cv-00287-JWH-KKx).

3 5. I am very familiar with employment law relating to class actions, their dynamics,
4 and also the risks inherent in litigating a class action through certification and trial. I have the
5 resources, experience, and expertise necessary to protect fully and fairly the interests of the
6 proposed class.

7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct. Executed on September 11, 2024 at Los Angeles, California.

9
10 STONEBROOK LAW

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12 By: 

13 JOSEPH TOJARIEH
14 Attorney for Plaintiffs
15 MAYRA DIAZ and ROBERT VILLAREAL
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