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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

NIMA NASERZADEH, individually, and on
behalf of all others similarly situated,

Plaintiff,

v.

KAMBRIAN CORPORATION, a California
corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 23STCV04343

*Assigned for all purposes to:
Hon. Carolyn B. Kuhl
Dept. 12*

**DECLARATION OF ARRASH T.
FATTAHI IN SUPPORT OF MOTION FOR
FINAL APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT**

FINAL APPROVAL HEARING

Date: February 3, 2026
Time: 10:30 a.m.
Dept.: 12

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1. I am admitted, in good standing, to practice as an attorney in the State of California, and the United States District Courts for the Central, Southern, Eastern, and Northern Districts of California. I am a Partner at Wilshire Law Firm, PLC, counsel of record for Plaintiff Nima Naserzadeh (“Plaintiff”). I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness. This Declaration is submitted in support of Plaintiff’s Motion for Final Approval of Class Action and PAGA Settlement.

3. Wilshire Law Firm, PLC was selected by Best Lawyers and U.S. News & World Report as one of the nation's Best Law Firms since 2020 and is comprised of more than 100 attorneys and over 600 employees. Wilshire Law Firm, PLC is actively and continuously practicing in employment litigation, representing employees in both individual and class actions in both state and federal courts throughout California.

5. I graduated from the University of California, Los Angeles with a Bachelor of Arts in Political Science, *summa cum laude*. I received my Juris Doctor from The George Washington University Law School. During law school, I was a member of the student editorial board for the Federal Circuit Bar Journal.

6. My practice is focused on advocating for the rights of consumers and employees in class action litigation. I am currently the managing attorney in charge of litigating several class

1 action cases in state and federal courts in California.

2 7. As the attorney responsible for day-to-day management of this matter at the
3 Wilshire Law Firm, PLC, I have over four years of experience litigating wage and hour class
4 actions. Over the past four plus years, I have managed and assisted with the litigation and
5 settlement of several wage and hour class actions. In those class actions, I performed similar tasks
6 as those performed in the course of prosecuting this action.

7 8. I was selected as a “Southern California Rising Star” in 2025.

8 9. My current contingent billing rate of \$750 per hour is consistent with the legal
9 market, accepted hourly rates, and my expertise and knowledge as it pertains to wage and hour
10 matters. Below is a non-exhaustive list of the cases where I have been appointed as class counsel
11 in my own right (as opposed to being part of a firmwide appointment of counsel):

- 12 a. *Kingsbury v. Caravan Foods II, Inc.*, Alameda County Superior Court, Case No.
13 RG21096357; Motion for Final Approval granted on January 31, 2023.
- 14 b. *Frias-Estrada v. Trek Retail Corporation*, Contra Costa County Superior Court,
15 Case No. MSC20-01916; Motion for Final Approval granted on March 3, 2023.
- 16 c. *Reyes v. Everytable, PBC, et al.*, Los Angeles County Superior Court, Case No.
17 21STCV35987; Motion for Final Approval granted on May 3, 2023.
- 18 d. *Ortiz v. Tara Materials, Inc.*, San Diego County Superior Court, Case No. 37-2021-
19 0001473-CU-OE-CTL; Motion for Final Approval granted on May 30, 2023.
- 20 e. *Cruz-Sanchez v. Eagle Lath & Plaster, Inc.*, Sacramento County Superior Court,
21 Case No. 34-2021-00293739-CU-OE-GDS; Motion for Final Approval granted on
22 May 30, 2023.
- 23 f. *Garduno v. New Generation Framing, Inc., et al.*, Stanislaus County Superior Court,
24 Case No. CV-21-000544; Motion for Final Approval granted on August 11, 2023.
- 25 g. *Hernandez, et al. v. Burford Farming Company, Inc.*, Fresno County Superior
26 Court, Case No. 21CECG03817; Motion for Final Approval granted on August 21,
27 2023.
- 28 h. *Barajas v. Final Phase Construction, Inc.*, San Bernardino County Superior Court,

Case No. CIVSB2118622; Motion for Final Approval granted on September 13, 2023.

i. *Jaimes, et al. v. Infiniti Health LLC*, Los Angeles County Superior Court, Case No. 22STCV07261; Motion for Final Approval granted on October 17, 2023.

j. *Nunez v. Gabriel Container*, Los Angeles County Superior Court, Case No. 21STCV09787; Motion for Final Approval granted on November 2, 2023.

k. *Lupercio v. Western CNC, Inc.*, San Diego County Superior Court, Case No. 37-2021-00010314-CU-OE-CTL; Motion for Final Approval granted on January 26, 2024.

l. *Jackson, et al. v. Apple Valley Communications, Inc., et al.*, San Bernardino County Superior Court, Case No. CIVSB2124721; Motion for Final Approval granted on February 1, 2024.

m. *Cuadras, et al. v. Guinn Corporation*, Kern County Superior Court, Case No. BCV-21-101520; Motion for Final Approval granted on February 22, 2024.

n. *Williams v. Total Longterm Care, Inc., et al.*, San Bernardino County Superior Court, Case No. CIVSB2213347; Motion for Final Approval granted on April 2, 2024.

o. *Meza v. Argus Management Company, LLC, et al.*, Los Angeles County Superior Court, Case No. 21STCV31612; Motion for Final Approval granted on May 20, 2024.

p. *Wade v. Mallory Safety and Supply LLC*, Siskiyou County Superior Court, Case No. 23CV00951; Motion for Final Approval granted on July 11, 2024.

q. *Snell v. Shasta Community Health Center*, Shasta County Superior Court, Case No. CVCV22-199416; Motion for Final Approval granted on November 12, 2024.

r. *Arce v. Sammy's Woodfired Pizza*, San Diego County Superior Court, Case No. 37-2023-00037670-CU-OE-CTL; Motion for Final Approval granted on January 10, 2025.

s. *Ochoa, et al. v. La Tavola, LLC*, Napa County Superior Court, Case No.

22CV000862; Motion for Final Approval granted on January 23, 2025.

t. *Brown, et al. v. Fidelity Security Services, Inc.*, Los Angeles County Superior Court, Case No. 21STCV31617; Motion for Final Approval granted on January 28, 2025.

u. *Torres v. Lupton Excavation, Inc.*, Sacramento County Superior Court, Case No. 34-2022-00317401-CU-OE-GDS; Motion for Final Approval granted on April 18, 2025.

v. *Peterson v. PJ Printers*, Orange County Superior Court, Case No. 30-2022-01247546-CU-OE-CTL; Motion for Final Approval granted on April 25, 2025.

w. *Harris v. D&D Gear Incorporated dba Absolute Technologies, Inc.*, Orange County Superior Court, Case No. 30-2021-01222330-CU-OE-CTL; Motion for Final Approval granted on April 25, 2025.

10. John G. Yslas is a Senior Partner at Wilshire Law Firm, PLC. He graduated from the University of California, Santa Barbara with High Honors in 1991 with Bachelor of Arts degrees in Psychology. He received his Juris Doctor from UCLA Law School in 1996.

11. Upon graduating from law school in 1996, Mr. Yslas worked for a boutique law firm practicing general litigation which included employment law matters. Since 2000 (that is, the last 25 years) his practice has been exclusively focused on labor and employment matters including handling wage and hour class, collective and representative actions (including the California Private Attorneys General Act, or “PAGA”), including in the international law firms of Morgan, Lewis & Bockius LLP (where he was a senior associate), Foley & Lardner LLP (where he was a partner and a national Vice Chair of the Labor and Employment Group), Norton Rose Fulbright LLP (where he was a partner) and Seyfarth Shaw LLP (where he was a partner and member of the Wage and Hour Practice Group). During his time at these law firms, Mr. Yslas was the primary attorney or took a major leading role in defending employers on numerous wage and hour class, collective and representative actions.

12. In late June 2022 Mr. Yslas left Seyfarth Shaw LLP and joined his current firm, Wilshire Law Firm, PLC, to represent plaintiff employees. He has been and is handling many wage and hour class and representative actions litigating such matters on behalf of plaintiff employees

1 in numerous Superior Courts and District Courts. From matters representing both plaintiffs and
2 defendants, he has successfully mediated the resolution of many wage and hour class, collective,
3 and representative actions. Just since starting to settle cases in late April 2023 Mr. Yslas has already
4 successfully mediated matters in which he has been counsel or co-counsel resulting in well over
5 \$200 million in settlements and verdicts which are in the process of being finalized, and with
6 numerous upcoming mediations scheduled. In those and numerous other matters, he has managed
7 and assisted with the litigation and settlement of many wage and hour PAGA and class actions. In
8 those actions, he performed similar tasks as those performed in the course of prosecuting this
9 action. Indeed, Mr. Yslas recently tried and prevailed in achieving a jury verdict in a wage and
10 hour class action in the matter of Aguilar-Flores v. Javier's – CC LLC, Los Angeles County
11 Superior Court, Case No. 19STCV36438 (settled after verdict).

12 13. Mr. Yslas has received numerous awards for his legal work. For example, from 2015
13 to 2018, he was listed in Los Angeles Super Lawyers for Employment Litigation (Thomson
14 Reuters). He has also served on numerous prominent boards and in other leadership positions,
15 including serving as Southern California Regional President for the Hispanic National Bar
16 Association and on the board of directors of the Mexican American Bar Foundation. Mr. Yslas
17 also previously served on the 5-member Los Angeles Civil Service Commission, which generally
18 oversees the personnel decisions for the City of Los Angeles.

19 14. Mr. Yslas has also published numerous blogs on labor and employment issues
20 including on wage and hour issues. For example, he published “Headline News: Wal-Mart v.
21 Dukes-Impact on Class Action Litigation” (while a partner with Foley & Lardner LLP) and “Are
22 You Really Protected From Wage-and-Hour Successor Liability in an Asset Purchase” (while a
23 partner with Seyfarth Shaw LLP). He has also been a presenter at numerous conferences, including
24 being a presenter involving the “Employment Law Update” at a National Employment Law
25 Council conference. He currently bills at an hourly rate of \$1,500.00.

26 15. Courtney M. Miller is a Settlement Attorney at WLF. She was admitted to practice
27 law in the State of California in 2019. Ms. Miller graduated from the University of California,
28 Santa Cruz, with a Bachelor of Arts in Sociology. Prior to becoming an attorney, Ms. Miller worked

1 at a boutique civil litigation firm for nearly a decade, primarily handling employment matters. She
2 earned her Juris Doctor from Southwestern Law School in 2019. Ms. Miller has prosecuted wage
3 and hour class and PAGA actions, almost exclusively, since 2020. As a handling attorney, Ms.
4 Miller obtained over \$30 million dollars in settlements on behalf of California employees. She
5 currently bills at an hourly rate of \$650.00.

6 16. Lisa B. Iturriaga is a Settlement Attorney at Wilshire Law Firm, PLC. She was
7 admitted to practice law in the State of California in 2021. Ms. Iturriaga graduated from University
8 of South Florida with a Bachelor of Science in Finance and a Bachelor of Arts in Marketing. She
9 received her Juris Doctor from Chapman University Dale E. Fowler School of Law. Since
10 graduating, her practice has been in insurance defense (previously) and employment law
11 (currently). Since 2023, she has exclusively worked on Plaintiff-side wage and hour cases. Ms.
12 Iturriaga is also a member of the California Employment Lawyers Association (CELA). She
13 currently bills at an hourly rate of \$550.00.

14 17. Arman A. Salehi is a third-year Associate Attorney at Wilshire Law Firm, PLC. He
15 was admitted to practice law in the State of California in 2023. Mr. Salehi graduated from the
16 University of California, Los Angeles with a Bachelor of Arts in Sociology. He received his Juris
17 Doctor from the University of California College of the Law, San Francisco (formerly known as
18 U.C. Hastings). Since November 2023, his practice has mainly been focused on wage and hour
19 class action litigation. He currently bills at an hourly rate of \$500.00.

20 18. Wilshire Law Firm, PLC, has performed significant work and incurred litigation
21 costs in prosecuting this matter with no guarantee of payment. The efforts expended by Class
22 Counsel to achieve this result include, but are not limited to, the following

- 23 a. the investigation of the matter, including meeting with Plaintiff, reviewing
24 Defendant Kambrian Corporation's ("Defendant") policies, and requesting
25 Plaintiff's time and pay records, personnel files, and exploring the corporate
26 structure of Defendant;
- 27 b. filing the Action;
- 28 c. drafting and finalizing the First Amended Complaint;

- d. drafting and finalizing the Second Amended Complaint;
- e. drafting and propounding written discovery on Defendant;
- f. drafting and serving notice of deposition of Defendant's person most knowledgeable;
- g. meeting and conferring with Defendant's counsel regarding the case;
- h. meeting and conferring with Defendant regarding mediation, exchange of informal discovery beforehand, and negotiating with opposing counsel regarding the parameters thereof;
- i. selecting a mediator and mediation date;
- j. working with opposing counsel and expert consultants for the receipt of a representative sampling and analyzing the same with the aid of expert consultants and Plaintiff to perform analyses of liability and exposure prior to attendance of the mediation in this matter;
- k. reviewing policy documents from Defendant and researching applicable defenses;
- l. preparation of a mediation brief and damages model for use at mediation;
- m. attendance at mediation by all Parties and Counsel;
- n. communicating with Plaintiff;
- o. negotiating, finalizing and fully executing the settlement agreement;
- p. preparing and filing the Motion for Preliminary Approval and supporting documents;
- q. preparing and filing supplemental documents for the Motion for Preliminary Approval;
- r. amending and fully executing the settlement agreement;
- s. communicating with the Settlement Administrator to ensure the Class Notice was properly distributed; and
- t. preparing the instant Motion for Final Approval and supporting documents.

19. Wilshire Law Firm, PLC's current lodestar reflects the efficiencies achieved by the attorneys' experience in this field with 127.1 hours of work resulting in \$87,030.00 in fees.

1 Wilshire Law Firm, PLC, dedicated significant resources to this case by dividing the tasks required
2 according to skill level. The hours expended by each attorney were not duplicative and reflect the
3 extensive investigation and analysis that was required to achieve this Settlement. This amount does
4 not include the time Class Counsel will spend at the final approval hearing and assisting the
5 Settlement Administrator following final approval. The chart below shows the calculation of hours
6 spent by each of Wilshire Law Firm, PLC's attorneys on this case:

Attorney	Hours	Hourly Rate	Total
John G. Yslas	2.9	\$1,500.00	\$4,350.00
Arrash T. Fattahi	79.3	\$750.00	\$59,475.00
Courtney M. Miller	1.7	\$650.00	\$1,105.00
Lisa B. Iturriaga	10	\$550.00	\$5,500.00
Arman A. Salehi	33.2	\$500.00	\$16,600.00
TOTALS	127.1		\$87,030.00

14 20. The risk factors present in this case favor the application of a 1.34 multiplier. To
15 begin, Class Counsel has singularly assumed the risk and costs of litigation purely on a contingency
16 basis. And, while Plaintiff is confident in the merits of his claims, a legitimate controversy exists
17 as to each cause of action posing an actual risk that Plaintiff may not succeed at class certification
18 and/or trial. Any of these obstacles could have prevented recovery completely, meaning Class
19 Counsel would have been left with no compensation for all the time and money invested in
20 litigating this case. Despite these risks, Class Counsel took this case on a contingency basis so that
21 Class Members (a particularly vulnerable group of hourly paid workers) could be compensated for
22 their unpaid wages. Consequently, Class Counsel was precluded from focusing on, or taking on,
23 other cases which could have resulted in a larger, and less risky, monetary gain. This time could
24 have been spent on other potentially lucrative cases.

25 21. In litigation costs, Wilshire Law Firm, PLC, has spent \$20,576.48 on items such as
26 filing fees, service fees, mediation fees, and expert fees. A true and correct copy of a breakdown
27 of costs incurred by my office is attached hereto as **Exhibit 1**. Additionally, we anticipate incurring
28 \$300.00 in anticipated future costs for filing fees and service fees. Since Class Counsel's costs did

1 not reach the maximum of \$30,000.00, the remaining \$9,123.52 will revert to and increase the Net
2 Settlement Amount. All of the costs incurred were reasonable and necessary for the prosecution of
3 this case.

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

6 23. A copy of the Class Action and PAGA Settlement Agreement has previously been
7 submitted to the LWDA. To date, the LWDA has not responded to or objected to the Settlement in
8 this matter.

9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct. Executed on January 9, 2026, at Los Angeles, California.

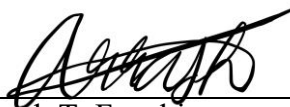
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13 _____
14 Arrash T. Fattahi
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EXHIBIT 1

Wilshire Law Firm, PLC
Transaction Detail by Account
All Transactions

1/8/2026
Accrual Basis

<u>Type</u>	<u>Date</u>	<u>Num</u>	<u>Memo</u>	<u>Amount</u>	<u>Balance</u>
COS					
Court Filing Fees					
	4/27/2023		One Legal LLC	\$ 18.69	\$ 18.69
	6/2/2023		One Legal LLC	\$ 18.69	\$ 37.38
	6/9/2023		One Legal LLC	\$ 18.69	\$ 56.07
	6/9/2023		One Legal LLC	\$ 173.11	\$ 229.18
	12/15/2023		Los Angeles Superior Court	\$ 2.00	\$ 231.18
	3/2/2023	56196	Valpro Attorney Services, LLC	\$ 1,663.50	\$ 1,894.68
	5/1/2025	90515	Valpro Attorney Services, LLC	\$ 159.00	\$ 2,053.68
	6/23/2025	92148	Valpro Attorney Services, LLC	\$ 160.00	\$ 2,213.68
	7/14/2023	20798335	One Legal LLC	\$ 18.69	\$ 2,232.37
	8/24/2023	21077075	One Legal LLC	\$ 18.69	\$ 2,251.06
	9/1/2023	21133185	One Legal LLC	\$ 18.69	\$ 2,269.75
	10/27/2023	21512595	One Legal LLC	\$ 18.69	\$ 2,288.44
	11/7/2023	21587134	One Legal LLC	\$ 18.69	\$ 2,307.13
	11/14/2023	21622027	One Legal LLC	\$ 18.69	\$ 2,325.82
	12/4/2023	21749360	One Legal LLC	\$ 18.69	\$ 2,344.51
	5/7/2024	22840633	One Legal LLC	\$ 20.74	\$ 2,365.25
	5/2/2025	25283471	One Legal LLC	\$ 86.42	\$ 2,451.67
	7/9/2025	CC073125TA-1140	One Legal LLC	\$ 45.12	\$ 2,496.79
	7/10/2025	CC073125TA-1184	One Legal LLC	\$ 23.44	\$ 2,520.23
	7/22/2025	CC073125TA-2919	One Legal LLC	\$ 23.44	\$ 2,543.67
	7/1/2025	CC073125TA-653	One Legal LLC	\$ 23.44	\$ 2,567.11
	8/19/2025	CC083125TA-1799	One Legal LLC	\$ 23.44	\$ 2,590.55
	8/20/2025	CC083125TA-1826	One Legal LLC	\$ 72.28	\$ 2,662.83
	9/15/2025	CC093025TA-1579	One Legal LLC	\$ 23.44	\$ 2,686.27
	7/1/2025	422637	Case Anywhere LLC	\$ 49.00	\$ 2,735.27
	8/4/2025	435227	Case Anywhere LLC	\$ 73.00	\$ 2,808.27
	9/2/2025	447748	Case Anywhere LLC	\$ 61.00	\$ 2,869.27
	10/1/2025	460466	Case Anywhere LLC	\$ 55.00	\$ 2,924.27
	11/3/2025	473399	Case Anywhere LLC	\$ 49.00	\$ 2,973.27
	12/1/2025	486259	Case Anywhere LLC	\$ 49.00	\$ 3,022.27
Total COURT FILING FEES				\$ 3,022.27	\$ 3,022.27
Legal Expenses Fees					
	3/10/2023		LWDA	\$ 75.00	\$ 75.00
	3/13/2024	319835	Case Anywhere, LLC	\$ 162.42	\$ 237.42
	6/6/2024	330428	Case Anywhere, LLC	\$ 153.00	\$ 390.42
	9/5/2024	341673	Case Anywhere, LLC	\$ 147.00	\$ 537.42
	12/6/2024	353051	Case Anywhere, LLC	\$ 147.00	\$ 684.42
	3/5/2025	373474	Case Anywhere, LLC	\$ 147.00	\$ 831.42
	4/4/2025	386315	Case Anywhere, LLC	\$ 49.00	\$ 880.42
	6/1/2025	398238	Case Anywhere, LLC	\$ 49.00	\$ 929.42
	6/2/2025	410294	Case Anywhere, LLC	\$ 73.00	\$ 1,002.42
	1/11/2023	847619313	Thomson Reuters-West Publis	\$ 11.03	\$ 1,013.45
	1/4/2024	849525394	Thomson Reuters-West Publis	\$ 19.24	\$ 1,032.69
	11/5/2024	851007765	Thomson Reuters-West Publis	\$ 474.77	\$ 1,507.46
Total LEGAL EXPENSES FEES				\$ 1,507.46	\$ 1,507.46
Asset Search Fees					
	10/8/2024	INV118553-01-01	USA Express	\$ 585.00	\$ 585.00
	10/14/2024	INV118554-01-01	USA Express	\$ 2,080.00	\$ 2,665.00
Total ASSET SEARCH FEES				\$ 2,665.00	\$ 2,665.00
Legal Mediation Fees					
	4/2/2024	700445a	Cerveris Mediation	\$ 8,500.00	\$ 8,500.00
Total LEGAL MEDIATION FEES				\$ 8,500.00	\$ 8,500.00
Professional Fees					
	10/9/2024	13230	Berger Consulting Group, LLC	\$ 4,875.00	\$ 4,875.00
Total PROFESSIONAL FEES				\$ 4,875.00	\$ 4,875.00
Other Costs					
	12/1/2021	E-2788186	Printing Cost	\$ 6.75	\$ 6.75
Total OTHER COSTS				\$ 6.75	\$ 6.75
TOTAL					\$ 20,576.48