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Attorneys for Plaintiff CINTIA SEVILLA,
on behalf of herself and others similarly situated

[Additional Counsel on following page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

JOSE MALDONADO, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

TPS SOLUTIONS INC. dba COAST
PERSONNEL, a California corporation; MESH
LOGISTICS, an entity of unknown form; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 23STCV07076

CLASS ACTION

*[Case Assigned for All Purposes to: The Hon.
Theresa M. Traber, Dept: 1]*

**DECLARATION OF STEPHEN M.
SLOANE IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND PAGA
SETTLEMENT**

Date: July 1, 2026

Time: 10:30 a.m.

Dept.: SS1

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20 on behalf of himself and others similarly situated
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DECLARATION OF STEPHEN M. SLOANE

I, Stephen M. Sloane, declare:

1. I am an attorney licensed to practice law in the state of California and have been admitted to practice before this Court. I am an associate attorney with the law firm Lavi & Ebrahimiyan, LLP, Counsel for Plaintiff Cintia Sevilla (“Plaintiff”) in this action, and I am an attorney assigned to work on this case. Based on my assignment to this case and familiarity with the file in this matter; I have personal knowledge of the matters stated herein and if called and sworn as a witness, I would and could competently testify under oath thereto. I am a member in good standing of the bar of the State of California and all State and Federal District Courts in California.

2. This Declaration is submitted in support of Plaintiffs’ Motion for Preliminary Approval of Class and PAGA Settlement.

EXPERIENCE OF CLASS COUNSEL

3. Lavi & Ebrahimiyan, LLP is experienced and qualified to act as Class Counsel, to evaluate the class claims, to evaluate settlement versus trial on a fully informed basis, and to evaluate the viability of the defenses.

4. The law firm of Lavi & Ebrahimiyan, LLP, have almost exclusively practiced in the area of labor and employment law and has. The partner of the firm who was lead counsel on this matter, Mr. Joseph Lavi, has been practicing law for nearly 20 years.

5. I graduated from New York University School of Law in 1988. I have been in practice with the law firm of Lavi & Ebrahimiyan, LLP since January 2025, focusing in the area of employment law and specifically wage and hour class actions. I have been involved in cases in all aspects of settlement, including California and Federal class actions and PAGA representative actions, and have previously served as class counsel in wage and hour class actions and PAGA representative actions.

6. I am also familiar with the practice of the firm’s lead Counsel, Joseph Lavi having worked as an associate with Lavi & Ebrahimiyan, LLP since January 2025, which has included reviewing Mr. Lavi’s declarations in support of motions for attorneys’ fees and/or to seek appointment as Class Counsel. Mr. Lavi graduated from law school in 2000 and has handled numerous cases in all aspects of employment and labor law, including state and federal class actions, wrongful termination, discrimination, harassment and retaliation cases. Mr. Lavi has tried employment cases in State and

1 Federal court, and has argued before various Courts of Appeals, on employment issues such as
2 validity of Arbitration Agreements, Application of Res Judicata in class action cases, and other
3 employment issues. Mr. Lavi has been a panelist and/or speaker for various Employment Law
4 Continuing Legal Education Panels on issues of employment law trials, how to proceed and conduct
5 trials, and proving and winning punitive damages. Mr. Lavi has been named a Southern California
6 Super Lawyer in the area of Plaintiff's employment litigation for Class Actions from 2011-2025. Mr.
7 Lavi has settled dozens of wage and hour class actions and is currently Plaintiff's counsel in many
8 others. Some of the class actions that Mr. Lavi has handled against employers on wage and hour
9 issues and have been approved as class counsel include cases against the following: Kaiser
10 Permanente which settled for \$6,510,000.00; Hustler Casino which settled for \$980,000.00; Chevron
11 Stations Inc., which settled for \$4,500,000.00; Commerce Casino which settled for \$1,575,000.00;
12 BP West Cost Products, which settled for \$4,000,000.00; Kaiser Permanente which settled for
13 \$3,600,000.00, Fuddruckers (as lead counsel) which settled for \$900,000.00; Movado Retail Group,
14 Inc. (as lead counsel) which settled for \$728,000.00, Chuck-E-Cheese's (as lead counsel) which
15 settled for \$1,900,000.00; Aero-Electric Connector, Inc. (as lead counsel) which settled for
16 \$1,500,000.00; Clougherty Packing, LLC (as lead counsel) which settled for \$4,250,000.00; and
17 Gruma Corporation (as lead counsel) which Defendants' petition to the United States Supreme Court
18 in the matter was denied and the matter settled for \$2,300,000.00. Mr. Lavi has been approved as
19 class counsel by both Federal and California Courts. Mr. Lavi and the other attorneys at Lavi &
20 Ebrahimian who are available to assist me in this case if needed are fully capable of adequately and
21 fairly representing Plaintiff and the proposed class in this matter.

22 7. Lavi & Ebrahimian, LLP, and has been appointed Class Counsel in over fifty contested
23 proceedings including the following:

- 24 a. *Ischak v. Kaiser Foundation Hospitals, Inc.*, Los Angeles Superior Court Case
25 No. BC343535;
- 26 b. *Santana v. El Pollo Loco, Inc.*, Los Angeles Superior Court Case No.
27 BC369846;
- 28 c. *Edlin, et al. v. Fuddruckers, Inc.*, United States District Court, Central District
of California, Case No. CV-07-3678-ABC;

1 d. *Chavez, et al. vs. CEC Entertainment, Inc. d/b/a Chukee-Cheeses*, Los Angeles
2 Superior Court Case No. BC380996;
3 e. *Bustamante, et al. v. Teamone Employment Specialists*, Los Angeles Superior
4 Court Case No. BC383266;
5 f. *Cervantes, et al. v. Kaiser Foundation Hospitals, Inc.*, Alameda Superior Court
6 Case No. RG 0265835;
7 g. *Seng Savang v. Club One Casino*; Fresno Superior Court Case No.
8 05CECG02189;
9 h. *Norman, et al. v. Movado Retail Group, Inc.*, United States District Court,
10 Central District of California, Case No. CV08-06691 SVW (PLA)
11 i. *Shand v. G.A.L.A., Inc. dba Giorgio Armani*, Los Angeles Superior Court Case
12 No. BC342588;
13 j. *Solis v. Plycraft Industries, Inc.*, Los Angeles Superior Court Case No.
14 BC374816;
15 k. *Campos v. HWB Carwash, Inc.*, Los Angeles Superior Court Case No.
16 BC378990;
17 l. *Acosta, et al. v. Texwood Industries*, United States District Court, Central
18 District of California, Case No. CV07-3237-DDP (PLAX);
19 m. *Arevalo v. Gruma Corporation*, Los Angeles Superior Court Case No.
20 BC410322;
21 n. *Burrola v. American Promotional Events*, Los Angeles Superior Court Case
22 No. BC412315;
23 o. *Cortez v. Trader Distribution Services*, Los Angeles Superior Court Case No.
24 BC397208;
25 p. *Cueva v. Allied Industries, Inc.*, Los Angeles Superior Court Case No.
26 BC399431;
27 q. *Del Toro v. Petco Animal Supplies, Inc.*, San Diego Superior Court Case No.
28 37-2009-00103626-CU-OE-CTL;

1 r. *Garcia v. Home Cooking, Inc.*, Los Angeles Superior Court Case No.
2 BC451148;
3 s. *Alcantar v. Amerimax Building Products, Inc.*, United States District Court,
4 Central District of California, Case No. CV 10-8916 DDP (CWx);
5 t. *Arancivias v. Clougherty Packaging, LLC dba Farmer John*, Los Angeles
6 Superior Court Case No. BC432406;
7 u. *Barajas v. Menzies Aviation, Inc.*, United States District Court, Central District
8 of California, Case No CV-10-02315-JEM;
9 v. *Barrera v. BHFC Operating, LLC dba Bottega Louie*, Los Angeles Superior
10 Court Case No. BC462603;
11 w. *Camacho v. American Textile Maintenance Co.*, Los Angeles Superior
12 Court Case No. BC452570;
13 x. *Cortes v. Monsanto Company*, Ventura Superior Court Case No. 56-2010-
14 00366952-CU-OE-VTA;
15 y. *Escobar v. Aero-Electric Connector, Inc.*, Los Angeles Superior Court Case
16 No. BC421009;
17 z. *Gomez v. Bacara Resort & Spa*, Santa Barbara Superior Court Case No.
18 1341987;
19 aa. *Gonzalez v. Ashley Furniture Industries, Inc.*, Los Angeles Superior Court
20 Case No. BC425708
21 bb. *Gonzalez v. Burrtec Waste Industries, Inc.*, Los Angeles Superior Court Case
22 No. BC436879;
23 cc. *Gutierrez v. Visterra Credit Union*, Riverside Superior Court Case No.
24 RIC10020183;
25 dd. *Hernandez v. Kruse & Son, Inc.*, Los Angeles Superior Court Case No.
26 BC411849;
27 ee. *Lopez v. Tecno Industrial Engineering*, Los Angeles Superior Court Case No.
28 BC411134;

1 ff. *Lowanga v. Continental Currency Services, Inc.*, Orange County Superior
2 Court Case No. 30-2011-0044011-CU-OE-CXC;

3 gg. *Aguilar v. PLS Financial Services, Inc.*, United States District Court, Central
4 District of California, Case No. CV 10-0415 ODW (FMOx)

5 hh. *Lozada v. Classic Party Rentals, Inc.*, Los Angeles Superior Court Case No.
6 BC443792;

7 ii. *Madrid v. OPI Products, Inc.*, Los Angeles Superior Court Case No.
8 BC451489;

9 jj. *Martinez v. J. Fletcher Creamer & Son, Inc.*, United States District Court Case
10 No. CV 10-0968-PSG-FMOX;

11 kk. *Martinez v. Administaff Companies II, L.P.*, Los Angeles Superior Court Case
12 No. BC425799;

13 ll. *Martinez v. Morgans Hotel Group Management, LLC*, Los Angeles Superior
14 Court Case No. BC446744;

15 mm. *Sanchez v. La Brea Bakery, Inc.*, Los Angeles Superior Court Case No.
16 BC456420;

17 nn. *Montenegro v. Ruggeri Marble and Granite, Inc.*, United States District Court,
18 Central District of California, Case No. CV-10-00711 JFW (PLAx);

19 oo. *Reed v. 99 Cents Only Stores*, Los Angeles Superior Court Case No.
20 BC436793;

21 pp. *Santos v. Noble Management Group-California, LLC*, United States District
22 Court, Central District of California, Case No. CV 10-2594 DSF (VBKx)

23 qq. *Taylor v. U.S. Healthworks Holding Company, Inc.*, Orange County Superior
24 Court Case No. 30-2011-00473505;

25 rr. *Valencia Diaz v. Gene Wheeler Farms, Inc.*, Los Angeles Superior Court Case
26 No. BC436235;

27 ss. *Zad-Behtooie v. Valley Village*, Los Angeles Superior Court Case No.
28 BC451490;

1 tt. *Bell v. Aidells Sausage Company, Inc.*, Alameda Superior Court Case No.
2 RG10523946;

3 uu. *Negrete v. Cenveo, Inc.*, United States District Court, Central District of
4 California, Case No. CV 11-09543 DSF (MRWx);

5 vv. *Bejar v. Exopack-Ontario, Inc.*, Orange County Superior Court Case No. 30-
6 2011-00518396-CU-OE-CXC;

7 ww. *Aguilar v. PLS Financial Services, Inc.*, United States District Court, Central
8 District of California, Case No. CV 10-0415 ODW (FMOx);

9 xx. *Sparks v. Larry Flynt dba Hustler Casino*, Los Angeles Superior Court Case
10 No. BC320172;

11 yy. *Morris v. Chevron Stations, Inc.*, Los Angeles Superior Court Case No.
12 BC361380;

13 zz. *Marino v. BP West Coast Products, LLC*, Los Angeles Superior Court Case
14 No. BC357987.

15 8. I do not believe that I or anyone at my firm has any conflicts of interest with the Class
16 or with the Class Representatives that would interfere with the duties as Class Counsel.

17 9. To my knowledge, none of the parties or attorneys involved in this Action has ever
18 had any financial interest in or affiliation with the proposed Administrator.

19 10. I am not aware, nor, to my knowledge, is anyone at my firm aware of any other pending
20 actions related to this matter.

21
22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct.

24 Dated: February 6, 2026

/s/ Stephen Sloane
Stephen M. Sloane, Esq.