

Edwin Aiwazian (SBN 232943)
Joanna Ghosh (SBN 272479)
Brian J. St. John (SBN 304112)
LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff Arlene Parra

David D. Bibiyan (SBN 287811)
Vedang J. Patel (SBN 328647)
Megan R. Lazar (SBN 315007)
BIBYAN LAW GROUP, P.C.
1460 Westwood Blvd.
Los Angeles, California 90024
Tel: (310) 438-5555 / Fax: (310) 300-1705

Attorneys for Plaintiff Shaloma Smith

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES -TORRANCE COURTHOUSE

ARLENE PARRA and SHALOMA SMITH,
individually, and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiff,

vs.

MARKSMAN SECURITY CORPORATION,
a Florida corporation; and DOES 1 through
100, inclusive,

Defendants.

CASE NO.: 23TRCV01864

[Assigned to the Honorable Alan B. Honeycutt
in Department E]

**DECLARATION OF DAVID D. BIBIYAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR APPROVAL OF REPRESENTATIVE
ACTION SETTLEMENT**

Reservation ID: 194841821040
Date: February 9, 2026
Time: 8:30 a.m.
Department: E

Complaint Filed: June 9, 2023
FAC Filed: November 14, 2025
Trial Date: None Set

1 **DECLARATION OF DAVID D. BIBIYAN**

2 1. I am an attorney at law, duly licensed to practice before all courts of the State of
3 California, and I am the principal of Bibiyan Law Group, P.C., counsel of record for Plaintiff
4 Shaloma Smith ("Plaintiff") in this action. I am familiar with the file, investigation, mediation,
5 and settlement of this matter and, if called as a witness, I could and would competently testify to
6 the matters stated herein based on my personal knowledge and review of records maintained by
7 my firm.

8 2. I submit this declaration in support of Plaintiffs' Motion for Approval of the Private
9 Attorneys General Act ("PAGA") Settlement Agreement. Based on my involvement in this matter,
10 I believe that the Settlement is fair, reasonable, and adequate in light of the risks, costs, and
11 uncertainties of further litigation relating to liability, penalties, and damages issues.

12 **PAGA Counsel's Requested Fees and Costs are Reasonable**

13 3. I believe PAGA Counsel are entitled to reasonable attorneys' fees pursuant to
14 California Labor Code section 2699(g)(1), which provides that "[a]ny employee who prevails in
15 any action shall be entitled to an award of reasonable attorney's fees and costs." Here, PAGA
16 Counsel seek an award of attorneys' fees in the amount of thirty-five percent (35%) of the Gross
17 Settlement Amount, which equals \$306,250.00, subject to any increase pursuant to the escalator
18 provision of the Settlement Agreement. I believe this request is reasonable, consistent with fee
19 awards approved in other complex wage-and-hour and PAGA representative actions, and
20 reasonable in light of PAGA Counsels' lodestar, the risks undertaken, and the results achieved.

21 **Litigation Experience**

22 4. I am an experienced class action attorney, have been appointed as class counsel in
23 other class actions and have a successful track record in litigating class and representative actions.

24 5. I graduated with a Bachelor of Arts degree from the University of California, Los
25 Angeles in 2009.

26 6. I received my Juris Doctorate from The University of Chicago Law School in 2012.

27 7. After practicing for several years as a member of Cohen & Lord, P.C., practicing
28 in an amorphous range of civil litigation on behalf of both plaintiff and defendants, I opened up a

1 law firm in 2014 with a concentration in representation of employees against employers to recover
2 unpaid wages and vindicate harassment, discrimination and retaliation in various contexts.

3 8. I am an active member of the California Employment Lawyers' Association
4 ("CELA"). I am one of its founding members and actively remain a member of its Reverse
5 Auctions Subcommittee; in doing so, I serve as a mediator between other plaintiffs' counsel who
6 bring overlapping class actions. I have also attended various Continuing Legal Education courses
7 pertaining to advocacy on behalf of employees.

8 9. I also created the content for, helped organize, and served as the Moderator for the
9 2023 California Complex Symposium Wage and Hour/PAGA Section, a Continuing Legal
10 Education seminar and forum featuring four respected Judges serving in the Complex Divisions
11 of their respective county Superior Courts. In addition, my firm served as a sponsor of that event.

12 10. Not only have I practiced almost exclusively in this field for years and have
13 contributed to the legal education curriculum for attorneys practicing within it, I am also a
14 published author in the Daily Journal as a contributor in the Wage and Hour and PAGA context,
15 including, in December 15, an article entitled: "PAGA: What's Gone, What's Left and What's
16 Next." I have also been a quoted source in multiple other publications, including in article
17 published by Bloomberg Law dated November 1, 2023 entitled: "Adidas, Home Depot Sued in
18 Test Cases on Job Ad Pay Transparency."

19 11. My firm has the experience, resources, and means necessary to allow us to provide
20 adequate representation as PAGA Counsel to all Aggrieved Employees in this litigation. With
21 approximately 30 attorneys, as well as supporting staff consisting of paralegals and legal
22 assistants, my office has the capacity to represent hundreds of thousands of class members, bring
23 forth efficient resolution of class actions and PAGA actions, engage in complex litigation, file
24 contested motions for class certification, and engage in trial practice.

25 12. My office has filed contested motions for class certification in the past and have
26 been appointed Class Counsel by the Superior Court of California in the past for purposes of
27 certifying a class for settlement purposes. Some examples of Actions in which I was appointed
28 Class Counsel for include:

1 • *Santoyo v. Consolidated Foundries, Inc.*, Case No. BC612298, California Superior
2 Court, County of Los Angeles, Honorable Judge Ann I. Jones, presiding;
3 • *Arendsdorff v. Stanley Steamer International, Inc.*, Case No. BC681368, California
4 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos, presiding;
5 • *Barreto v. Don Roberto Jewelers, Inc.*, Case No. BC495451, California Superior Court,
6 County of Los Angeles, Honorable Ann I. Jones, presiding;
7 • *Junior Amilcar Laguna Gonzalez v. Takaaki Koyama*, Case No. BC641998, Los Angeles
8 Superior Court, Honorable Elihu M. Berle, presiding;
9 • *Rios v. Nongshim America, Inc.*, Case No. CIVDS1807390, California Superior Court,
10 County of San Bernardino, Honorable David S. Cohn, presiding;
11 • *Stoddard v. Molded Fiber Glass – West*, Case No. 1517758, California Superior Court,
12 County of San Bernardino, Honorable David S. Cohn, presiding;
13 • *Mata v. Sahara Scaffold, Inc.*, Case No. CIVDS1810785, California Superior Court,
14 County of San Bernardino, Honorable David S. Cohn, presiding;
15 • *Carrasco v. Pure Dental Solutions*, Case No. BC645995, Los Angeles Superior Court,
16 Honorable Kenneth R. Freeman, presiding;
17 • *Gonzalez v. Gochez, et al.*, Case No. BC648729, Los Angeles Superior Court, Honorable
18 Maren Nelson, presiding;
19 • *Montoya v. Superior Paving Co.*, Case No. CIVDS1833422, County of San Bernardino,
20 Honorable David S. Cohn, presiding;
21 • *Lopez v. Norred & Associates, Inc.*, Case No. CIVDS1824109, California Superior
22 Court, County of San Bernardino, David S. Cohn, presiding;
23 • *Noyola v. Lacren, LLC*, Case No. BC717024, California Superior Court, County of Los
24 Angeles, Hon. Anthony Mohr, presiding;
25 • *Luciano, et al. v. O’Tasty Foods, Inc., et al.*, Case No. BC711988, California Superior
26 Court, County of Los Angeles, Honorable Maren Nelson, presiding;
27 • *Gordon v. Hospice Source, LLC*, Case No. 34-2018-00250022-CU-OE-GDS, California
28 Superior Court, County of Sacramento, Honorable Christopher E. Krueger, presiding;

1 • *Barragan v. Refrigeration Supplies Distributor*, Case No. 19STCV09312, California
2 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;
3 • *Ramirez v. Acre Gourmet, Inc.*, Case No. CGC-19-575117, California Superior Court,
4 County of San Francisco, Honorable Andrew Y.S. Cheng, presiding;
5 • *Villafuerte v. Bay Alarm Company*, Case No. BC689110, California Superior Court,
6 County of Los Angeles, Honorable Amy D. Hogue, presiding;
7 • *Cazares v. Areas USA LAX, LLC*, Case No. 19STCV08209, California Superior Court,
8 County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;
9 • *Magana v. Castlerock Environmental, Inc., et al.*, Case No. 19STCV38353, California
10 Superior Court, County of Los Angeles, Honorable Ann I. Jones, presiding;
11 • *Chilel v. Sushi California, Inc.*, Case No. 19STCV08209, California Superior Court,
12 County of Los Angeles, Honorable Ann I. Jones, presiding;
13 • *Malone v. Orange Courier, Inc., et al.*, Case No. 30-2016-00763474, California Superior
14 Court, County of Orange, Honorable Glenda Sanders, presiding;
15 • *Rivera v. Talamo Food Services, Inc.*, Case No. 19CV355856, California Superior Court,
16 County of Santa Clara, Honorable Patricia M. Lucas, presiding;
17 • *Olguin v. Cal Central Harvesting, Inc.*, Case No. 18CV03860, California Superior Court,
18 County of Santa Barbara, Honorable James F. Rigali, presiding;
19 • *Pence v. Sober Living by the Sea, Inc.*, Case No. 2018-00988742, California Superior
20 Court, County of Orange, Honorable Randall J. Sherman, presiding;
21 • *Franco v. Vincent Rags, Inc.*, Case No. 20STCV07768, California Superior Court,
22 County of Los Angeles, Honorable Ann I. Jones, presiding;
23 • *Cabral v. Miller Castings, Inc.*, Case No. 19STCV39556, California Superior Court,
24 County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;
25 • *Bolanos v. Texas Roadhouse, Inc.*, Case No. 19STCV39556, California Superior Court,
26 County of Los Angeles, Honorable Sunshine Sykes, presiding;
27 • *Rodriguez v. Scott A. Humphreys, Inc.*, Case No. 30-2021-01184556-CU-OE-CXC,
28 California Superior Court, County of Ventura, Honorable Matthew P. Guasco, presiding; and

- 1 • *Torres v. Primal Pet Foods, Inc.* Case No. FCS054783, California Superior Court,
2 County of Solano, Honorable Wendy G. Getty, presiding;
- 3 • *Hanson v. Zapata Nuccio, Inc.*, Case No. 20STCV28951, California Superior Court,
4 County of Los Angeles, Honorable Elihu M. Berle, presiding;
- 5 • *Molina v. Avibank Mfg, Inc.*, Case No. 20STCV03910, California Superior Court,
6 County of Los Angeles, Honorable John P. Doyle, presiding;
- 7 • *Cetina v. Lawry's Restaurants, Inc.*, Case No. 19STCV05201, California Superior Court,
8 County of Los Angeles, Honorable Amy D. Hogue, presiding;
- 9 • *Luna v. Pronto California General Agency, LLC*, Case No. 19STCV39951, California
10 Superior Court, County of Los Angeles, Honorable Elihu M. Berle, presiding;
- 11 • *Alvarez v. Kazak-Mars, Inc.*, Case No. 20STCV42587, California Superior Court,
12 County of Los Angeles, Honorable Elihu M. Berle, presiding;
- 13 • *Noe v. My Pillow, Inc.* Case No. CIVDS 2011360, California Superior Court, County of
14 San Bernardino, Honorable David Cohn, presiding;
- 15 • *Nunez v. 2751 West Coast Acquisition Company*, Case No. 30-2020-01145215-CU-
16 OE-CXC, California Superior Court, County, County of Orange, Honorable Randall J. Sherman,
17 Presiding;
- 18 • *Smith v. McMillen Enterprises, Inc.*, Case No. CV-20-002938, California Superior Court,
19 County of Stanislaus, Honorable John R. Mayne, presiding;
- 20 • *Turner v. Plant Prefab Inc., et al.*, Case No. CIVDS2017517, California Superior Court,
21 County of San Bernardino, Honorable David Cohn, presiding;
- 22 • *Duran v. Fresh Select, LLC*, Case No. VCU284892, California Superior Court, County
23 of Tulare, Honorable Bret Hillman, presiding;
- 24 • *Reynoso, et al. v. Cream of the Crop AG Service, Inc.*, Case No. VCU278847, California
25 Superior Court, County of Tulare, Honorable Bret Hillman, presiding;
- 26 • *Michel v. Universal Waste Systems, Inc.*, Case No. 19STCV46181, California Superior
27 Court, County of Los Angeles, Honorable David S. Cunningham presiding;
- 28 • *Jungers v. U.S. Borax Inc., et al.*, Case No. BCV-21-10003, California Superior Court,

1 County of Kern, Honorable Bernard C. Barmann Jr. presiding;
2 • *Fortune v. Amoroso Limited Partnership, et al.*, Case No. 20STCV25874, California
3 Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;
4 • *Montoya, et al. v. Remo, Inc.* Case No. 20STCV34614, California Superior Court,
5 County of Los Angeles, Honorable Maren Nelson presiding;
6 • *Rincon, et al. v. New-Indy Tripaq, LLC, et al.* Case No. 20STCV17118, California
7 Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;
8 • *De Leon, et al. v. Wismettac Asian Foods, Inc.* Case No. 19STCV18172, California
9 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
10 • *Tapia v. Mercer Foods, Inc.* Case No. CV-21-000020, California Superior Court,
11 County of Stanislaus, Honorable Sonny S. Sandhu presiding;
12 • *Molina v. Reser's Fine Foods, Inc.* Case No. 37-2021-00013052-CU-OECTL, California
13 Superior Court, County of San Diego, Honorable Eddie C. Sturgeon presiding;
14 • *Reyes v. Imperial Sprinkler Supply, Inc.* Case No. 30-2020-01167748-CU-OE-CXC,
15 California Superior Court, County of Los Angeles, Honorable Peter Wilson presiding;
16 • *Zavala, et al. v. PLS Check Cashers, Inc.* Case No. 20STCV42586, California Superior
17 Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
18 • *Paz v. Hill Brothers Chemical Company.* Case No. 20STCV48279, California Superior
19 Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
20 • *Garcia v. Inwesco Incorporated.* Case No. 20STCV46833, California Superior Court,
21 County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
22 • *Guevara v. J&K Culver, LLC, et al.* Case No. 19STCV39951, California Superior Court,
23 County of Los Angeles, Honorable Elihu M. Berle presiding;
24 • *Hamilton v. Michael Kors Stores, Inc. et al.*, Case No. 19STCV37061, California
25 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;
26 • *Arzooian v. A&M Administration, LLC, et al.* Case No. 21STCV05576, California
27 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;
28 • *Santos, et al. v. Maruzen of America, Inc.*, Case No. 19STCV37662, California Superior

1 Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;
2 • *Schaffino v. M.O. Dion & Sons., Inc., et al.*, Case No. 20STCV38023, California Superior
3 Court, County of Los Angeles, Honorable Gail Killefer presiding;
4 • *Moreno v. Santa Paula Post Acute, LLC, et al.* Case No. 21STCV12533, California
5 Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;
6 • *Singer v. Desert Area Resources and Training*, Case No. BCV-21-101093, California
7 Superior Court, County of Kern, Honorable Thomas S. Clark presiding;
8 • *Clarizio v. Guard-Systems, Inc.*, Case No. 21STCV28667, California Superior Court,
9 County of Los Angeles, Honorable Armen Tamzarian presiding;
10 • *Guzman v. Freschco Painters, Inc.*, Case No. 21STCV04683, California Superior Court,
11 County of Los Angeles, Honorable Lawrence P. Riff presiding;
12 • *Koutny v. PAE Aviation and Technical Services, LLC*, Case No. 21C-0106, California
13 Superior Court, County of Kings, Honorable Melissa R. D’Morias presiding;
14 • *Rodriguez v. Pacifica Trucks, LLC*, Case No. 20STCV37576, California Superior Court,
15 County of Los Angeles, Honorable Stuart Rice presiding;
16 • *Ramos v. AEGIS Treatment Centers, LLC*, Case No. 20STCV41429, California Superior
17 Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
18 • *Valdez v. Integrated Building Services, Inc.* Case No. 20STCV37793, California Superior
19 Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
20 • *Harris v. America One Security, Inc.* Case No. 21STCV01399, California Superior
21 Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
22 • *Moreno v. M&J Seafood Company, Inc.* Case No. 22STCV03341, California Superior
23 Court, County of Los Angeles, Honorable William F. Highberger presiding;
24 • *Corrales v. Q&B Foods, Inc.* Case No. 20STCV40885, California Superior Court,
25 County of Los Angeles, Honorable Elihu Berle presiding;
26 • *Arteaga v. Demolition Specialist, Inc.* Case No. RIC2001133, California Superior Court,
27 County of Riverside, Honorable Harold Hopp presiding;
28 • *Vigil, et al. v. Capstone Turbine Corporation*, Case No. 20STCV32123, California

1 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
2 • *Ramirez v. Sea-Win, Inc.* Case No. 21STCV22026, California Superior Court, County
3 of Los Angeles, Honorable Lawrence P. Riff presiding;
4 • *Ortega Chavez v. Winpak Lane, Inc.* Case No. CIVSB2207313, California Superior
5 Court, County of San Bernardino, Honorable Jessica Morgan presiding;
6 • *Garcia v. American Licorice Company.* Case No. RG21107049, California Superior
7 Court, County of Alameda, Honorable Brad Seligman presiding;
8 • *Madrono v. Vitale Nursing, Inc, et al.,* Case No. 21STCV09845, California Superior
9 Court, County of Los Angeles, Honorable Lawrence P. Riff presiding; and
10 • *Orellana v. Advanced Building Maintenance.* Case No. 34-2020-00286791-CU-OE-
11 GDS, California Superior Court, County of Sacramento, Honorable Jill Talley presiding.
12 • *Aguilar v. Bioness, Inc., et al.,* Case No. 21STCV41702, California Superior Court,
13 County of Los Angeles, Honorable Lawrence P. Riff presiding;
14 • *Antoine v. Pinky Beverly Hills, LLC., et al.* Case No. 19STCV44856, California
15 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
16 • *Phambui v. Fashion Marketing and Merchandising Group, Inc., et al.* Case No.
17 21STCV06634, Superior Court, County of Los Angeles, Honorable Stuart M. Rice presiding;
18 • *Ortega Chavez v. Winpak Lane, Inc., et al.* Case No. CIVSB2202274, California
19 Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;
20 • *Carrasco v O.H. Barkhordar D.D.S., Inc., et al.* Case No. 22STCV21188, California
21 Superior Court, County of Los Angeles, Honorable Lawrence Riff presiding;
22 • *Correia v. Gallo Glass Company, et al.* Case No. CV-21-006459, California Superior
23 Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;
24 • *Davis v. Beeline Import and Services, LLC, et al.* Case No. CIVSB2119287, California
25 Superior Court, County of San Bernardino, Honorable David Cohn presiding;
26 • *Angel Lopez v Innovative Coatings Technology Corporation dba Incotec, et al.* Case No.
27 30-2020-01173245-CU-OE-CXC, California Superior Court, County of Orange, Honorable Lon
28 Hurwitz presiding;

1 • *Lopez v UPM, Inc., et al. Case No. 20STCV36695*, California Superior Court, County of
2 Los Angeles, Honorable Lawrence P. Riff presiding;

3 • *Moreno v. Infiniti Group LLC., et al. Case No. CIVSB2223551*, California Superior
4 Court, County of San Bernardino, Honorable Joseph T. Ortiz presiding;

5 • *Kelley v. Applus Technologies, Inc., et al. Case No. CIVSB2204889*, California Superior
6 Court, County of San Bernardino, honorable Jessica Morgan presiding;

7 • *Hernandez v Bromley Foods, Inc., et al. Case No. 56-2021-00561326-CU-OE-VTA*,
8 California Superior Court, County of Ventura, Honorable Henr Walsh presiding;

9 • *Heredia v. Alan Smith Pool Plastering, Inc., et al. Case No. 30-2020-01163609-CU-OE-*
10 *CXC*, California Superior Court, County of Orange, Honorable Randall J. Sherman presiding;

11 • *Martinez Guzman v Freshco Painters Inc., et al. Case No. 21STCV04683*, California
12 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

13 • *Gomez Mireles v. USG Ceilings Plus, LLC., et al. Case No. 21STCV45606*, California
14 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;

15 • *Garzon v. Mobile Hi-Tech Wheels, LLC., et al., Case No. 21STCV15396*, California
16 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;

17 • *Dethrasavong v. ASI Computer Technologies, Inc., et al. Case No. 20STCV32312*,
18 California Superior Court, County of Contra Costa, Honorable Kenneth R. Freeman presiding;

19 • *Lopez v. Waldorf Astoria Management LLC., et al. Case No. 20STCV17212*, California
20 Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;

21 • *Viveros v. Mission Produce, Inc., et al. Case No. 20STCV15737*, California Superior
22 Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;

23 • *Flores v. United Maintenance Company, Inc., et al. Case No. 21STCV07008*, California
24 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;

25 • *Blandi v. Francesca Restaurant, LLC., et al. Case No. 37-2022-00049034-CU-OE-CTL*,
26 California Superior Court, County of San Diego, Honorable Marcella O. McLaughling presiding;

27 • *Lopez Cabrera v. South Valley Almond Company, LLC, et al. Case No. BCV-2-100722*,
28 California Superior Court, County of Kern, Honorable Bernard C. Barmann, Jr. presiding;

1 • Guillermo Cruz v. Alma Family Serives, et al. Case No. 21STCV18156, California
2 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
3 • Davood v. NKSFB, LLC, et al. Case No. 22STCV17305, California Superior Court,
4 County of Los Angeles, Honorable Christopher K. Lui presiding;
5 • Ferrer v. Ineos USA, LLC., et al., Case No. 21STCV28076, California Superior Court,
6 County of Los Angeles, Honorable Elihu M. Berle presiding;
7 • Portillo Sanchez v. Paragon Services Janitorial Orange County, LLC, et al. Case No.
8 20STCV38562, California Superior Court, County of Los Angeles, Honorable William F.
9 Highberger presiding;
10 • Trigueros Garcia v. Highland Plastics, Inc., et al., Case No. CVRI2202836, California
11 Superior Court, County of Riverside, Honorable Harold Hopp presiding;
12 • Magana Ramirez v. 360 Support Services, et al. Case No. 22STCV20456, California
13 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
14 • Morales v. Baldy's Restaurant Group, LLC., et al. Case No. 20STCV36535, California
15 Superior Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;
16 • Gonzales v. El Monte Rents, Inc., et al. Case No. 21STCV10209, California Superior
17 Court, County of Los Angeles, Honorable Stuart M. Rice presiding;
18 • Gonzalez v. Total Education Solutions, Inc., et al. Case No. 20STCV37984, California
19 Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;
20 • Helaire v. Smithfield Packaged Meats Corp, et al. Case No. JCCP5244, California
21 Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;
22 • Hernandez v. Central Valley Recovery Services, et al. Case No. VCU290220, California
23 Superior Court, County of Tulare, Honorable Brett Hillman presiding;
24 • Hernandez v. SC Commercial, LLC, et al. Case No. 30-2020-01166961-CU-OE-CXC,
25 California Superior Court, County of Orange, Honorable Lon Hurwitz presiding;
26 • Hines v. Constellis Integrated Risk Management Services, et al. Case No.
27 20STCV26962, California Superior Court, County of Los Angeles, Honorable Christopher K. Lui
28 presiding;

1 • *Moya v. Valassis Direct Mail, Inc., et al.* Case No. 21STCV09412, California Superior
2 Court, County of Los Angeles, Honorable Stuart Rice presiding;
3 • *Jordan v. The Martin-Brower Company, LLC, et al.*, Case No. 21STCV41435, California
4 Superior Court, County of Los Angeles, honorable Stuart Rice presiding;
5 • *Juarez v. Calmet Services, Inc., et al.* Case No. 21STCV33668, California Superior
6 Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;
7 • *Mcintosh v. WWL Vehicle Services Americas Inc., et al.* Case No. 56-2022-00562544-
8 CU-OE-VTA, California Superior Court, County of Ventura, Honorable Benjamin Coats
9 presiding;
10 • *Mendoza v. Amusement Industry, Inc., et al.* Case No. 21STCV09790, California
11 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
12 • *Moore v. Dnata US Inflight Catering LLC, et al.* Case No. CGC-20-586512, California
13 Superior Court, County of San Francisco, Honorable Curtis Karnow presiding;
14 • *Peterson v. Sorenson Engineering, Inc., et al.* Case No. CIVDS2023994, California
15 Superior Court, County of San Bernardino, Honorable David Cohn presiding;
16 • *Torres v. Laurel Avenue, LLC, et al.* Case No. CIVSB2202708, California Superior
17 Court, County of San Bernardino, Honorable David Cohn presiding;
18 • *Nunley v. Cardinal Logistics Management Corporation et al.* Case No. CIVSB2210430,
19 California Superior Court, County of San Bernardino, Honorable Joseph T. Ortiz presiding;
20 • *Pastrana v. National Sign & Marketing Corporation et al.* Case No. CIVSB2118749,
21 California Superior Court, County of San Bernardino, Honorable David Cohn presiding;
22 • *Pineda v. Grand Life, Inc., et al.* Case No. 21STCV28066, California Superior Court,
23 County of Los Angeles, Honorable Elihu M. Berle presiding;
24 • *Pattingale v. Laird Family Estate, LLC et al.* Case No. 22CV000048, California Superior
25 Court, County of Napa, Honorable Cynthia P. Smith presiding;
26 • *Ramirez v. Sea Win, Inc., et al.* Case No. 21STCV22026, California Superior Court,
27 County of Los Angeles, Honorable Lawrence P. Riff presiding;
28 • *Reategui v. Cal Building & Maintenance Industries, Inc.*, Case No. 20STCV39648,

1 California Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;
2 • *Rodriguez v. ACRA Aerospace, LLC, et al.* Case No. 30-2020-01171360-CU-OE-CXC,
3 California Superior Court, County of Orange, Honorable Randall J. Sherman presiding;
4 • *Rodriguez v. Ultra Pro International LLC, et al.* Case No. 21STCV11250, California
5 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
6 • *Ruiz v. Kleen Harvest, Inc., et al.* Case No. 21CV002319, California Superior Court,
7 County of Monterey, Honorable Thomas W. Wills presiding;
8 • *Roberto Ruiz v. Protech Delivery and Installation et al.* Case No. 21STCV07001,
9 California Superior Court, County of Los Angeles, Honorable Stuart M. Rice presiding;
10 • *Russell v. CIMC Reefer Trailer, Inc., et al.* Case No. RIC2001777, California Superior
11 Court, County of Riverside, Honorable Harld Hopp presiding;
12 • *Russell v. Staffmark Investment LLC, et al.* Case No. CVRI12103921, California
13 Superior Court, County of Riverside, Honorable Harold Hopp presiding;
14 • *Quintanilla et al. v. Chrome Hearts LLC, et al.* Case No. 21STCV43180, California
15 Superior Court, County of Los Angeles, Honorable Elihu B. Berle presiding;
16 • *Taat v. Acell, Inc., et al.* Case No. 37-2022-00005437-CU-OE-CTL, California Superior
17 Court, County of San Diego, Honorable Matthew C. Braner presiding;
18 • *Todd v. Motivate, LLC, et al.* Case No. CGC-23-605052, California Superior Court,
19 County of San Francisco, Honorable Anne- Christine Massullo presiding;
20 • *Turner Sr., v. The Sidewalk Café, Inc., et al.* Case No. 21STCV10154, California
21 Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;
22 • *Vargas-Flores v. Harbor Bay Club, Inc., et al.* Case No. 21CV002396, California
23 Superior Court, County of Alameda, Honorable Michael Markman presiding;
24 • *Vasquez v. Liquid Technologies, Inc., et al.* Case No. CIVDS2023892, California
25 Superior Court, County of San Bernardino, Honorable Joseph Ortiz presiding;
26 • *Vasquez et al. v. Kingswood LLC, et al.,* Case No. 20STCV32123, California Superior
27 Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
28 • *Sandoval Villafana v. Satco, Inc., et al.* Case No. 21STCV17085, California Superior

1 Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;
2 • *Williams v. Marrs Services, Inc., et al.* Case No. 21STCV23775, California Superior
3 Court, County of Los Angeles, Honorable Stuart M. Stuart presiding;
4 • *Low v. Triple Canopy, Inc., et al.* Case No. 37-2023-0007078-CU-OE-CTL, California
5 Superior Court, County of San Diego, Honorable Carolyn Caietti presiding;
6 • *Camacho v. Premium Electric Corp, et al.* Case No. 22STCV26878, California Superior
7 Court, County of Los Angeles, Honorable David S. Cunningham presiding;
8 • *Lopez v. Bachem Americas, Inc., et al.* Case No. 23STCV04258, California Superior
9 Court, County of Los Angeles, Honorable Laura Seigle presiding;
10 • *Mendoza Cendejas v. E. & J. Gallo Winery, et al.* Case No. CV-22-005396, California
11 Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;
12 • *Romero v. Armstrong Installation Service, et al.* Case No. 22CV022519, California
13 Superior Court, County of Alameda, Honorable Noel Wise presiding;
14 • *Perez v. D&G Restaurants, LLC, et al.* Case No. 30-2021-01209638-CU-OE-CXC,
15 California Superior Court, County of Orange, Honorable Peter Wilson presiding;
16 • *Sarmiento, et al. v. Neil Jones Food Company* Case No. 21CECG03825, California
17 Superior Court, County of Fresno, Hon. Kristi Culver Kapetan presiding;
18 • *Garcia v. Nature Fresh Farms, LLC, et al.* Case No. ECU001961, California Superior
19 Court, County of Imperial, Honorable Jeffery B. Jones presiding.
20 • *Machuca v. Charleys Philly Steaks, et al.* Case No. FCS057713, California Superior
21 Court, County of Solano, Hon. Christine A. Carringer presiding;
22 • *Machuca v. Charleys Philly Steaks, et al.* Case No. FCS058064, California Superior
23 Court, County of Solano, Hon. Christine A. Carringer presiding;
24 • *Olivares v. PCI Industries, LLC, et al.* Case No. 22STCV37965, California Superior
25 Court, County of Los Angeles, Hon. Samantha P. Jessner presiding;
26 • *Robles v. FM Mexican Grill Inc., et al.* Case No. BC716450, California Superior Court,
27 County of Los Angeles, Hon. Daniel J. Buckley presiding;
28 • *Sarmiento v. The Neil Jones Food Company., et al.* Case No. 21CECG03825, California

1 Superior Court, County of Fresno, Hon. Kristi Culver Kapetan presiding;
2 • *Jimenez v. Route 66, Post Acute LLC Agency, LLC., et al.* Case No. 23STCV03441,
3 California Superior Court, County of Los Angeles, Hon. Laura A. Seigle presiding;
4 • *Diaz v. UCA General Insurance Services, Inc., et al.* Case No. 30-2021-01185227-CU-
5 OE-CXC, California Superior Court, County of Orange, Hon. Randall J. Sherman presiding;
6 • *Moctezuma v. Direct Line Global, LLC., et al.* Case No. 23CV033075, California
7 Superior Court, County of Alameda, Hon. Michael Markman presiding;
8 • *Williams v. Fortec Medical, Inc., et al.* Case No. 22CV014116, California Superior
9 Court, County of Alameda, Hon. Michael Markman presiding;
10 • *Franco et al. v. Inland Behavioral and Health Services et al.* Case No. CIVSB2118579,
11 California Superior Court, County of San Bernardino, Hon. Christian Towns presiding;
12 • *Arballo et al. v. California Custom Fruits and Flavors, Inc., et al.* Case No.
13 22STCV35657, California Superior Court, County of Los Angeles, Hon. Elihu Berle presiding;
14 • *Henderson v. Bizon Group, Inc., et al.* Case No. HG21115170, California Superior Court,
15 County of Alameda, Hon. Noel Wise presiding;
16 • *Boothe et al. v. Lemonade Restaurant Group, LLC, et al.* Case No. 22STCV38302,
17 California Superior Court, County of Los Angeles, Hon. Laura Seigle presiding;
18 • *Montoya et al. v. FPR II, L.L.C., et al.* Case No. 22CV404499, California Superior Court,
19 County of Santa Clara, Hon. Theodore C. Zayner;
20 • *Martinez Flores v. APT Maintenance, Inc., et al.,* Case No. 22CV024427, California
21 Superior Court, County of Alameda, Honorable Somnath Raj Chatterjee presiding;
22 • *Montoya v. TLMVACO LLC., et al.,* Case No. 23CV001593, California Superior Court,
23 County of Monterey, Honorable Thomas W. Willis presiding;
24 • *Getaw v. Consolidated Disposal Services LLC., et al.,* Case No. 21STCV22036,
25 California Superior Court, County of Los Angeles, Honorable Elihu Berle presiding;
26 • *Barocio v. Industrial Field Services Inc., et al.,* Case No. 23STCV01522, California
27 Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;
28 • *Mostafa Gad v. St. George Auto Sales, Inc., et al.,* Case No. 30-2019-01058127-CU-OE-

1 CXC, California Superior Court, County of Orange, Honorable Lon F. Hurwitz presiding;

2 • *Federics v. The HWood Group, LLC, et al.*, Case No. 21STCV44105, California

3 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;

4 • *Deaver v. Blue Diamond Growers, et al.*, Case No. 34-2022-00316490-CU-OE-GDS,

5 California Superior Court, County of Sacramento, Honorable Lauri A. Damrell presiding;

6 • *Rosa v. Paqueteria HR Express, Inc., et al.*, Case No. 23STCV00890, California

7 Superior Court, County of Los Angeles, Honorable Theresa M. Traber presiding;

8 • *Martnez v. Kenyon Plastering, Inc., et al.*, Case No. CIVSB2216155, California Superior

9 Court, County of San Bernardino, Honorable Christian Towns presiding;

10 • *Mora v. IGT Global Solutions Corporation, et al.*, Case No. 22STCV05393, California

11 Superior Court, County of Los Angeles, Honorable Timothy Patrick Dillon presiding;

12 • *Zuniga v. House Foods America Corporation, et al.*, Case No. 8:22-cv-00372-JWH-

13 JDEx, California State Court, County of Orange, Honorable John W. Holcomb presiding;

14 • *Ramirez v. Primez Farms LLC, et al.*, Case No. 20STCV06328, California Superior

15 Court, County of Los Angeles, Honorable Elaine Lu presiding;

16 • *Pacheco v. JCC Logistics, Inc., et al.*, Case No. B-21-102266, California Superior Court,

17 County of Kern, Honorable Thomas Clark presiding;

18 • *Caballero v. The Ensign Group, Inc., et al.*, Case No. 19STCV43230, California Superior

19 Court, County of Los Angeles, Honorable William F. Highberger presiding;

20 • *Graciano v. Hignell, Incorporated, et al.*, Case No. 22CV01196, California Superior

21 Court, County of Butte, Honorable Stephen E. Benson presiding;

22 • *Ruiz v. Butterfield Electric, Inc., et al.*, Case No. 22CV010662, California Superior Court,

23 County of Alameda, Honorable Michael Markman presiding;

24 • *Lozano v. LECC Berg Feinfield Eye Centers, LLC, et al.*, Case No. 22STCV40646,

25 California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;

26 • *Villalpando et al. v. Los Angeles Truck Service, LLC, et al.*, Case No. 22STCV11804,

27 California Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;

28 • *Pablo Martinez v. Superior Cattle Feeders, LLC, et al.*, Case No. ECU002635, California

1 Superior Court, County of Imperial, Honorable Brooks Anderhold presiding;

2 • *Milon v David & Esperanza Chavez Family Limited Partnership DBA Chavez*
3 *Supermarket et al.*, Case No. 20CV368379, California Superior Court, County of Santa Clara,
4 Honorable Theodore C. Zayner presiding;

5 • *Flores et al. v. Parkwood Landscape Maintenance Inc., et al.*, Case No.: 20STCV12795,
6 California Superior Court, County of Los Angeles, Honorable Stuart Rice presiding;

7 • *Williams v. Holland Partner Group Operations, LLC, et al.*, Case No.: 23CV049392,
8 California Superior Court, County of Alameda, Honorable Sarah Stanford-Smith presiding;

9 • *Estrada v Cookunity Inc., et al.*, Case No.: 24STCV12367, California Superior Court,
10 County of Los Angeles, Honorable Laura A. Seigle presiding;

11 • *Silvas v. Catalyst Family, Inc.*, Case No.: 21CV385134, California Superior Court,
12 County of Santa Clara, Honorable Charles F. Adams presiding;

13 • *Arnett v. Traditions Health LLC*, Case No.: CVRI2305219, California Superior Court,
14 County of Riverside, Honorable Harold W. Hopp presiding;

15 • *Gammaro v. Walgreen Pharmacy Services Midwest, LLC*, Case No.: 23STCV00615,
16 California Superior Court, County of Los Angeles, Honorable Daniel M. Crowley;

17 • *Montoya v. Beauty 21 Cosmetics, Inc.*, Case No.: CIVSB2314841, California Superior
18 Court, County of San Bernardino, Honorable Joseph T. Ortiz presiding;

19 • *Santos Martinez et al. v. Le Zinc Bar LLC*, Case No.: 22STCV09367, California Superior
20 Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;

21 13. I have also settled matters on a “PAGA Only” basis for aggrieved employees in the
22 past, including in:

23 • *Flores v. Delta Apparel, Inc.*, Case No. BC641499, California Superior Court, County
24 of Los Angeles, Honorable Daniel J. Buckley, presiding;

25 • *Segura v. CJ Foods Service Holdings USA, LLC*, Case No. 19STCV24918, California
26 Superior Court, County of Los Angeles, Honorable Maureen Duffy-Lewis, presiding;

27 • *Sierra v. Nexem-Allied, LLC*, Case No. 20STCV11281, California Superior Court,
28 County of Los Angeles, Honorable Randolph M. Hammock, presiding;

1 • *Nodal v. Sodexo, Inc.*, Case No. 20STCV40601, California Superior Court, County of
2 Los Angeles, Honorable Lawrence Riff, presiding; and
3 • *Cooper v. Lucas Health Partners*, Case No. 20STCV20050, California Superior Court,
4 County of Los Angeles, Honorable Maren Nelson, presiding;
5 • *Herrera v. Greystar Management, LP, et al.*, Case No. 37-2020-00009672-CU-OE-CTL,
6 California Superior Court, County of San Diego, Honorable Carolyn Caietti, presiding;
7 • *Slater v. Jo-Ann Stores, LLC.*, Case No. 21STCV18454, California Superior Court,
8 County of Los Angeles, Honorable Maurice A. Leiter, presiding;
9 • *Bolanos v. Canoga Park Heating & Air Conditioning, Co., Inc.*, Case No. 21STCV12674,
10 California Superior Court, County of Los Angeles, Honorable Yolanda Orozco, presiding;
11 • *Granados v. Cosmetic Ideas, Inc.* Case No. 21STCV10797, California Superior Court,
12 County of Los Angeles, Honorable Richard L. Fruin, presiding;
13 • *Ruano v. DPC Woodwork, Inc.* Case No. 21STCV00408, California Superior Court,
14 County of Los Angeles, Honorable Jon R. Takasugi presiding;
15 • *Hardy v. Texas Roadhouse Management Corp., et al.* Case No. CIVSB2222259,
16 California Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;
17 • *Iraheta v Legacy Farmers, Inc., et al.* Case No. MSC21-00762, California Superior
18 Court, County of Los Angeles, Honorable Charles S. Treat presiding;
19 • *Landin v Central Janitors' Supply Co., Inc., et al.* Case No. CV-21-006391, California
20 Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;
21 • *Bailey v. Cannon Constructors, et al.* Case No. 21STCV38274, California Superior
22 Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;
23 • *Johns, et al. v. Whelan Security of California, Inc., et al.* Case No. 22STCV68687,
24 California Superior Court, County of Los Angeles, Honorable Laura Seigle presiding;
25 • *Carrion v. Clutter, Inc., et al.* Case No. 23STCV06709, California Superior Court,
26 County of Los Angeles, Honorable Kerry Bensinger presiding;
27 • *Delia v. The Irvine Company, LLC, et al.* Case No. 30-2019-01050823-CU-OE-CXC,
28 California Superior Court, County of Orange, Honorable William D. Claster presiding;

1 • *Landin v. Central Janitor’s Supply Co., Inc., et al.* Case No. CV-21-006391, California
2 Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;
3 • *German Vaca et al., v. California Pizza Kitchen, Inc., et al.* Case No. 30-2022-01278828-
4 CU-OE-CXC, California Superior Court, County of Orange, Honorable Randall Sherman
5 presiding;
6 • *London Young v. Amazon.com LLC, et al.* Case No. 21STCV38280, California Superior
7 Court, County of Los Angeles, Honorable Elaine Lu presiding;
8 • *Martinez v. Dick’s Sporting Goods, Inc., et al.* Case No. 22STCV17283, California
9 Superior Court, County of Los Angeles, Honorable Armen Tamzarian presiding;
10 • *Latrice Ackles v. Brinker Restaurant Corporation, et al.* Case No. 22STCV19068,
11 California Superior Court, County of Los Angeles, Honorable Gail Killefer presiding; and
12 • *Ruiz v. Edelbrock Foundry, LLC, et al.* Case No. 20STCV19057, California Superior
13 Court, County of Los Angeles, Honorable David S. Cunningham presiding.
14 • *Bey v. Holliday Rock Co., Inc., et al.* Case No. CIVSB2316000, California Superior
15 Court, County of San Bernardino, Honorable Kory Mathewson presiding;
16 • *Ruvalcaba v. Rod Fraser Enterprises, Inc., et al.* Case No. 30-2023-01308022-CU-OE-
17 CXC, California Superior Court, County of Orange, Hon. Layne H. Melzer presiding;
18 • *Rhea et al. v. Stars behavioral health Group, Inc., et al.* Case No. CIVDS2017661,
19 California Superior Court, County of San Bernardino, Hon. Joseph T. Ortiz presiding;
20 • *Franco et al. v. Golden Queen Mining Company, LLC, et al.* Case No. BCV-23-102813,
21 California Superior Court, County of Kern, Hon. T. Mark Smith presiding; and
22 • *Ledesma v. Connell Chevrolet et al.* Case No. 30-2021-01210019-CU-OE-CXC,
23 California Superior Court, County of Orange, Honorable William Claster presiding;
24 • *Essary v. Community Corporation of Santa Monica, et al.* Case No. 23STCV03250,
25 California Superior Court, County of Los Angeles, Honorable Samantha Jessner presiding;
26 • *Nestor et al., v. Redlands Community Hospital, et al.* Case No. CIVSB2327089,
27 California Superior Court, County of San Bernardino, Honorable Wilfred J. Schneider, Jr.
28 presiding;

1 • *Azzawi v. C-Store Services, Inc., et al.* Case No. CIVSBZ228712, California Superior
2 Court, County of San Bernardino, Honorable Joseph B. Wildman presiding;

3 • *Quintero v MW BHCC LLC, et al.* Case No. 22STCV32539, California Superior Court,
4 County of Los Angeles, Honorable Rice Stuart presiding;

5 • *Mendivil v. HG Foods, LLC*, Case No.: VCU296223, California Superior Court, County
6 of Tulare, Honorable Gary M. Johnson presiding;

7 • *Barron De Expinoza v. Silicon Resourcing Solutions, LLC.*, Case No.:
8 2023CUOE010215, California Superior Court, County of Ventura, Honorable Maureen M.
9 Houska presiding;

10 Furthermore, my office has succeeded in certifying classes in contested motions for class
11 certification. Some of the classes and theories we have certified include, without limitation, for
12 failure to pay the regular rate of pay; failing to pay overtime and minimum wages, including,
13 without limitation, for temperature checks; failure to provide meal and rest premiums, including,
14 without limitation, for requiring employees to walk during breaks; failure to timely pay wages
15 prior to separation of employment; wage statement violations; and unfair competition. Some
16 examples of matters in which we have done so include, without limitation:

17 • *Hernandez, et al. v. C.R. Lawrence Co., Inc.*, Case No. 20STCV32372, California
18 Superior Court, County of Los Angeles, Hon. William Highberger presiding; and

19 • *Lopez v. Rolling Hills Country Club*, Case No. 21STCV22636, California Superior
20 Court, County of Los Angeles; Hon. Carolyn B. Kuhl presiding; and

21 • *Torres v. Johnston Nurseries, FLP*, Case No. BCV-19-100830 TSC, California Superior
22 Court, County of Kern; Hon. Thomas S. Clark, presiding.

23 14. Currently, my firm is acting as counsel in dozens of wage and hour class actions
24 and representative PAGA actions.

25 15. I believe that I am sufficiently experienced and qualified to evaluate the claims
26 alleged in this action and viability of Defendant's defenses.

27 16. Vedang J. Patel has been a member of my law firm for over three (3) years and
28 served as class counsel on numerous actions on which I was also named class counsel. Prior to

1 working with Bibiyan Law Group, P.C., he practiced law with Murchison & Cumming, LLP on a
2 variety of matters on behalf of defendants. Thereafter, he joined Bibiyan Law Group, P.C.,
3 practicing law on behalf of Plaintiffs in matters of employment law, and specifically on cases
4 involving unpaid wages and class action settlements. He is currently a Partner at Bibiyan Law
5 Group, P.C., and head of the Settlement Department. Among other tasks, he oversees and manages
6 all settlements at Bibiyan Law Group, P.C. He also oversees several attorneys, paralegals, and
7 legal assistants and has overseen the settlement of over one hundred (100) class and PAGA matters
8 while with our office.

9 17. After a thorough investigation and settlement discussions, I arrived at terms that I
10 viewed was in the best interest of both Plaintiff and Aggrieved Employees.

11 **PAGA Counsel's Requested Fees and Costs are Reasonable**

12 18. I believe PAGA Counsel are entitled to recover attorneys' fees and costs. PAGA
13 Counsel request a fee of thirty-five percent (35%) of the Gross Settlement Amount, which, unless
14 and until escalated pursuant to the Parties' Settlement Agreement, amounts to \$306,250.00, is
15 reasonable, is well within the range of fees generally sought and approved in other class and
16 representative cases, and is also reasonable based on PAGA Counsel's lodestar.

17 19. PAGA Counsel invested time and resources into litigating this Action, with
18 \$3,981.57 of costs to date, deferred to the end of the case and entirely contingent on the outcome,
19 which, as set forth above, the recovery of which was far from certain with much of the litigation
20 still potentially pending.

21 20. During the period that this Action has been pending, PAGA Counsel have advanced
22 all expenses, and have not received any compensation for prosecuting the Action on behalf of the
23 State and other Aggrieved Employees.

24 **An Award of Fees Based on a Percentage of the Common Fund**
25 **is Appropriate and Reasonable**

26 21. I believe the percentage of attorneys' fees set forth in the Settlement (i.e., thirty-
27 five percent (35%) of the Gross Settlement Amount is reasonable. I am informed and believe that,
28 historically, courts have awarded percentage fees in the range of 20% to 50% in complex

1 representative actions, depending on the circumstances of the case.

2 22. Here, I believe the requested fee is consistent with the fees awarded in other PAGA
3 settlements approved by California courts.

4 23. PAGA Counsel invested time and resources into litigating this Action, with
5 \$3,981.57 of costs to date and counting, deferred to the end of the case and entirely contingent on
6 the outcome, which, as set forth above, the recovery of which was far from certain with much of
7 the litigation still potentially pending. It has been a long-recognized principle that an attorney
8 merits a significantly larger fee when the compensation is contingent, rather than being fixed on
9 a time or contractual basis. During the period that this Action has been pending, PAGA Counsel
10 have advanced all expenses and have not received any compensation for prosecuting the Action
11 on behalf of the State and other Aggrieved Employees.

12 24. I believe the significant outlay of monetary and personnel resources has been
13 completely at risk and wholly dependent upon obtaining a substantial settlement or the imposition
14 of civil penalties at trial. I believe PAGA Counsel should not be penalized with a lower fee for
15 settling the case prior to trial, because the percentage of the fund method “encourages early
16 settlement, which avoids protracted litigation.” Thus, the requested award of attorneys’ fees is
17 reasonable under the percentage of the fund method.

18 **The Requested Fees are Also Reasonable Under a Lodestar Crosscheck**

19 25. I believe PAGA Counsel earned the requested fee, as this case was vigorously
20 litigated.

21 26. I understand from my position as principal of Bibiyan Law Group, P.C., my
22 involvement with the case, and information provided by my staff, that Bibiyan Law Group, P.C.,
23 has collectively billed 249.7 hours. Specifically, I billed 8.8 hours at my hourly rate of \$1,100 per
24 hour. Sarah Cohen billed 14.6 hours at her hourly rate of \$900 per hour. Michael Braud billed 61.7
25 hours at his hourly rate of \$450 per hour. Vedang J. Patel billed 88.2 hours at his hourly rate of \$800
26 per hour. Megan R. Lazar billed 43.7 hours at her hourly rate of \$550 per hour. Bradford Smith
27 billed 11.2 hours at his hourly rate of \$500 per hour. Paralegals billed 11.4 hours at \$200 per hour.

1 Finally, legal assistants billed 10.1 hours at \$95 per hour. At Bibiyan Law Group, P.C.'s hourly
2 rates, this results in a total lodestar amount of \$154,019.50 for Bibiyan Law Group, P.C.

3 **PAGA Counsel's Hours Spent on the Case**

4 27. After diligent inquiry of the members of my firm, I can attest that Bibiyan Law
5 Group, P.C., has spent over 249.7 hours litigating this Action to bring it to resolution, not including
6 time which will be expended monitoring the administration of the settlement and distribution of
7 funds to Aggrieved Employees.

8 28. The efforts expended by PAGA Counsel to achieve this result include, but are not
9 limited to, the following:

- 10 • Investigating Defendant's corporate structure to determine whether any additional
11 individuals or entities should be named in the litigation, and researching other cases
12 filed against Defendant;
- 13 • Compliance with prerequisites in connection with Plaintiff's cause of action under
14 PAGA;
- 15 • Filing and serving of the PAGA Notice for Plaintiff;
- 16 • Filing and serving pleadings in the Action, including the initial complaint in both the
17 instant Action and Class Action;
- 18 • Reviewing and analyzing Defendant's Answers filed in each Action;
- 19 • Review and analysis of the Court's Minute Orders, attention to scheduling and
20 delegation of actions in light thereof, meeting and conferring with Defendants'
21 counsel, drafting and filing Joint Reports, and preparation for appearance at
22 conferences and hearings;
- 23 • Review and analysis of Defendant's purported arbitration agreements, extensive
24 discussions with counsel for Defendant regarding the enforceability of the arbitration
25 agreements;
- 26 • Review and analysis of Defendant's Motion to Compel Arbitration ("MTCA"), and
27 declarations filed in support thereof;

- 1 • Drafting Joint Stipulation to Stay Action Pending Settlement and meeting and
2 conferring with Defendant's counsel regarding same while the Parties engaged in
3 informal and formal discovery and focused their efforts on mediation;
- 4 • Extensive discussions as to the scope of informal discovery and documents to be
5 produced;
- 6 • Drafting and serving written discovery including Plaintiff's Request for Production
7 of Documents and Special Interrogatories designed to elicit pertinent information
8 from Defendant in order for Plaintiff to evaluate the claims asserted in the Action,
9 and reviewing Defendant's responses to same;
- 10 • Drafting Stipulation and Protective Order Regarding Exchange of Information and
11 Documents and meeting and conferring with Defendant's counsel regarding same;
- 12 • Obtaining and reviewing informal discovery from Defendant, including time and
13 payroll records for non-exempt employees of Defendant, during the PAGA Period,
14 Defendant's written policies and employee handbook, Plaintiff's personnel files, and
15 other informal discovery produced for Plaintiffs to evaluate the claims asserted;
- 16 • Discussing the potential merits of mediation, as well as negotiating the parameters
17 thereof and the informal discovery to be exchanged beforehand, which involved
18 iterations of written correspondence back and forth and several telephone discussions
19 between counsel regarding the potential scope of discovery, as well as the scope of
20 the pleadings;
- 21 • Working with opposing counsel and consultants for the receipt of time records,
22 payroll records, and data points for Aggrieved Employees, and analyzing the same
23 with the aid of retained expert data consultants and Plaintiff to perform analyses of
24 liability and exposure;
- 25 • Selecting a mediator and scheduling a mediation date;
- 26 • Preparation of mediation brief, analysis, and damages model in conjunction with
27 expert data consultants, for use at the mediation session;
- 28 • Attendance at a full-day session of mediation by various attorneys;

- Extensive negotiation, with the assistance of a mediator, regarding the terms of the settlement, which was memorialized in a long form Settlement Agreement;
- Extensive exchange of numerous versions of the long form Settlement Agreement, and finalizing and fully executing the long form Settlement Agreement;
- Drafting and reviewing the PAGA Payment Letter;
- Selecting a third-party administrator with counsel for Defendant for administration of the PAGA Payment Letter to Aggrieved Employees and obtaining bids for settlement administration;
- Communicating with Plaintiff who requested updates or other information regarding this matter;
- Working with opposing counsel and the Settlement Administrator to ensure timely administration of the PAGA Payment Letter to Class Members; and
- Preparing the instant declaration in support of Plaintiffs' Motion for Approval and attendance at hearing on Motion for Approval.

29. PAGA Counsel also bear the risk of taking whatever actions are necessary if Defendant fails to pay. Thus, the Court should find that PAGA Counsel's hours were necessary and reasonable to achieve the excellent result. PAGA Counsel's hourly rates are in line with, and, in fact, modest, compared with the hourly rates of other counsel in similar actions.

30. And, the over 249.7 hours expended by the lawyers and staff members of Bibiyan Law Group, P.C., in connection with this Action is only a calculation of efforts made thus far; it does not include the time that will be spent preparing for and attending the approval hearing, reviewing the Settlement Administrator's final calculations and subsequent coordination with the Settlement Administrator to ensure payments to Aggrieved Employees are timely distributed. Thus, PAGA Counsel request that the Court find that these hours are reasonable in this litigation.

31. I am informed and believe that with my declaration and the declaration of my co-counsel from Lawyers for Justice, PAGA Counsel have established by declaration testimony the hundreds of hours spent in this case, which suffices for evidentiary purposes.

32. The total combined lodestar from both Bibiyan Law Group, P.C., and Lawyers for Justice exceeds over \$370,000.00. Plaintiffs request attorneys' fees of only \$306,250.00. No multiplier is necessary as PAGA Counsel has incurred far more in attorneys' fees than PAGA Counsel requests in fees from the Gross Settlement Amount.

The Quality of Representation, the Novelty and Complexity of the Issues, and the Results Obtained

33. PAGA Counsel used a high level of skill in addressing the difficult questions presented in this case, which involved the contested issues regarding: the compliance of various of Defendant's policies with the Labor Code, including whether all time worked was paid for; whether meal and/or rest breaks were given in compliance with the Labor Code; issues regarding the timeliness of pay, including whether all pay was received by termination or resignation; the sufficiency and accuracy of wage statements (including whether issues therewith, if any, were intentional or injurious); and various other issues.

34. PAGA Counsel are not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

Litigation Expenses Incurred by PAGA Counsel

35. The itemized costs incurred by Bibiyan Law Group, P.C. in the above-referenced matter total \$3,981.57. A more detailed itemized list of costs is below and attached hereto as Exhibit “1.”

(1) Filing and Messenger Fees:	\$3,763.83
(2) LWDA Filing Fee:	\$75.00
(3) Service of Process:	\$93.50
(4) Postage:	\$34.84
(5) Photocopies (72 x \$0.2):	\$14.40

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct this 14th day of January 2026, at Los Angeles, California.

David Bibiyan
David D. Bibiyan

EXHIBIT 1



David D. Bibiyan

Attorney at Law

1460 Westwood Blvd.
Los Angeles, California 90024

310.438.5555 T

310.300.1705 F

david@tomorrowlaw.com

www.tomorrowlaw.com

January 15, 2026

DATE	TYPE	PAYABLE TO	TOTAL AMOUNT	
3/7/25	E-Filing	Steno Agency, Inc.	\$	54.95
2/24/25	E-Filing	Steno Agency, Inc.	\$	80.95
2/19/25	E-Filing	Steno Agency, Inc.	\$	54.95
2/10/25	E-Filing	All-N-One Legal Support	\$	1,011.75
9/17/24	E-Filing	All-N-One Legal Support	\$	31.75
9/9/24	E-Filing	All-N-One Legal Support	\$	11.75
9/9/24	E-Filing	All-N-One Legal Support	\$	11.75
8/22/24	E-Filing	All-N-One Legal Support	\$	11.75
7/24/24	E-Filing	All-N-One Legal Support	\$	20.50
7/23/24	E-Filing	All-N-One Legal Support	\$	11.75
6/6/24	E-Filing	All-N-One Legal Support	\$	11.75
4/29/24	E-Filing	All-N-One Legal Support	\$	11.75
4/29/24	E-Filing	All-N-One Legal Support	\$	11.75
3/13/24	E-Filing	All-N-One Legal Support	\$	11.75
3/13/24	E-Filing	All-N-One Legal Support	\$	11.75
2/29/24	E-Filing	All-N-One Legal Support	\$	11.75
1/15/24	E-Filing	OnCall-Legal	\$	28.54
1/10/24	E-Filing	All-N-One Legal Support	\$	446.75

List of Expenses Items 2024.03.28 - 1/15/2026

1/8/24	E-Filing	OnCall-Legal	\$	99.99
12/28/23	E-Service	All-N-One Legal Support	\$	299.72
11/3/23	Service of Process	All-N-One Legal Support	\$	93.50
11/7/23	E-Filing	All-N-One Legal Support	\$	11.75
10/13/23	E-Filing	All-N-One Legal Support	\$	11.75
10/13/23	Postage	United States Postal Service	\$	8.53
10/3/23	Filing	One Legal	\$	1,492.98
9/28/23	LWDA fee	Department Of Labor	\$	75.00
9/27/23	Postage	United States Postal Service	\$	26.31
Various Dates	Photocopies	(72 x \$0.2)	\$	14.40
		Total	\$	3,981.57