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Attorneys for Plaintiffs

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

AVEON GOOSBY and AMERICO PENA, as
private attorneys general,

Plaintiff,

vs.

PANDA RESTAURANT GROUP, INC., a
California corporation; PANDA EXPRESS, INC.,
a California corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 23STCV15228

[Hon. Timothy Patrick Dillon, Department 15]

**DECLARATION OF EMIL DAVTYAN IN
SUPPORT OF PLAINTIFFS' MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

Date: August 19, 2026
Time: 9:00 a.m.
Department: 15

Complaint Filed: June 29, 2023
FAC Filed: December 28, 2023
SAC Filed: June 3, 2024
TAC Filed: June 2, 2026

1 I, Emil Davtyan, declare as follows:

2 1. I am an attorney admitted to practice in the State of California and am co-counsel of
3 record for Plaintiffs. I make this declaration on the basis of my own personal knowledge, except as to
4 those matters stated on information and belief and, as to those matters, I believe them to be true. If called
5 as a witness, I could testify competently as to the facts stated in this declaration.

6 2. I graduated from the Woodbury University in 2008 with a Bachelor's degree in Business
7 Finance with highest honors, as the top student in my class. I graduated from Southwestern Law School
8 in 2014 in the top 10% of my class. I am currently the managing attorney at D.Law, Inc. (formerly
9 known as Davtyan Law Firm) in Pasadena, California.

10 3. I am an attorney duly licensed to practice law in the State of California and am a member
11 in good standing with the State Bar of California.

12 4. My legal experience since becoming a member of the California State Bar has been
13 exclusively devoted to the practice of California and federal employment law. My office exclusively
14 represents plaintiffs in wage and hour actions with the same or similar causes of actions brought forth in
15 the matter pending before this Court.

16 5. I have been actively participating in the prosecution and successful settlement of
17 numerous wage and hour class and PAGA actions, helping to recover wages and penalties on behalf of
18 tens of thousands of class members.

19 6. My office has been appointed as Class/PAGA Counsel in numerous Class/PAGA actions,
20 including, *De La Rosa v. The Coca Cola Company et al.* (Superior Court of California in Napa,
21 17CV000787), *Harvey v. Bed Bath & Beyond of California Limited Liability Company* (Superior Court
22 of California in Alameda, RG17885153), *Ramirez v. Harris Ranch Beef Company* (Superior Court of
23 California in Fresno, 16CECG04103), *Gates v. Gate Gourmet, Inc. et al.* (Southern District of
24 California, 16-cv-01084-L-AGS), *Hargrave v. Antelope Valley Hospital* (Superior Court of California in
25 Los Angeles, BC663252), *Ramirez v. Milton Roy et al.* (Superior Court of California in Los Angeles,
26 BC 632276), *Hawkins v. AvalonBay Communities* (Superior Court of California in Santa Clara,
27 17CV316492), *Jones Tharpe et al. v. Sprint Corporation et al.* (Superior Court of California in Los
28 Angeles, BC644645), *Ortega et al. v. Nestle Waters North America, Inc. et al.* (Superior Court of

1 California in Los Angeles, BC623610), *Schultz v. Jimbo's Natural Family, Inc.* (Superior Court of
2 California in San Diego, 37-2017-00022348-CUE-OE-CTL), *Ambrose v. Victor Valley Global et al.*
3 (Superior Court of California in San Bernardino, CIVDS1709289), *Puerta-Gildardo v. Real Time*
4 *Staffing Services LLC et al.* (Superior Court of California in Los Angeles, BC565445), *Vargo v. Pregis*
5 *Innovative Packaging LLC* (Superior Court of California in Tulare, 270836), *Conlin v. Aegis Senior*
6 *Communities LLC* (Northern District of California, 17-cv-05534-LHK), *Galarza v. Kloeckner Metals*
7 *Corporation* (Central District of California, 2:17-cv-04910- FMO), *Estes v. L3 Technologies, Inc. et al.*
8 (Southern District of California, 3:17-cv-02356-H-JMA), *Rowser v. Trunk Club, Inc.* (Central District of
9 California, 2:17-cv-05064-DSF-RAO), *Leach v. The Claremont Colleges, Inc.* (Superior Court of
10 California in Los Angeles, BC686451), *Vaesau v. PCT Enterprises, Inc. dba Precision Cabinets*
11 (Superior Court of California, County of Contra Costa MSC18-02404), *Terry v. TF Louderback, Inc.*
12 *dba Bay Area Beverage Company* (Superior Court of the State of California, County of Contra Costa,
13 MSC18-00859), *Roach v. Westcare California, Inc.* (Superior Court of California in Kern County, BCV-
14 17-102367-SDS), *Patton v. Church & Dwight Co., Inc.* (Central District of California, EDCV 18- 903-
15 MWF (KKx)), *Juarez v. ISL Employees, Inc.* (Superior Court of California in Madera, MCV074787),
16 *Ferraro v. USC Verdugo Hills Hospital, et al.* (Superior Court of California in Los Angeles,
17 18STCV09463), *Ford v. Account Control Technology, Inc., et al.* (Superior Court of California in Los
18 Angeles, 19STCV09369), *Ornelas v. iStorage, et al.* (Superior Court of California in San Francisco,
19 CGC-18-571421), *Martinez v. Ronpak, Inc.* (Superior Court of California in Riverside, RIC1901307),
20 *Barrera et al. v. Exclusive Wireless, Inc.* (Superior Court of California in Stanislaus, 9000687), *Barajas*
21 *v. Mancha Development Company LLC* (Superior Court of California in Orange County, 30-2018-
22 00974707-CU-OE-CXC), *Prado v. IMAX Corporation dba IMAC Worldwide Home* (Superior Court of
23 California in San Bernardino, CIVDS1820265), *Rodriguez v. ND Industries, Inc.* (Superior Court of
24 California in Los Angeles, 19STCV38096), *Singletary v. Motel 6 Operating LP, et al.* (Southern District
25 of California, 3:20-cv-0270-LAB-AHG), *Quizon v. CF Watsonville East, LLC, et al.* (Superior Court of
26 California in Santa Cruz, 20CV01868), *Stephenson v. Bakersfield Dodge, Inc.* (Superior Court of
27 California in Kern, BCV-20-102693), *Bacerra v. Hugo Boss Retail, Inc.* (Superior Court of California in
28 San Diego, 37-2021-00002933-CU-OE-CTL), *Walker v. Ariat International, Inc.* (Superior Court of

1 California in Alameda, HG19026439), *Orr v. Petvet Care Centers* (California) Inc. (Superior Court of
2 California in Santa Clara, 19CV354063), *Jimenez v. OEC Distribution Services, Inc.* (Superior Court of
3 California in San Bernardino, CIVDS1915743), *Virdi v. Absolute Security International* (Superior Court
4 of California in San Bernardino, CIVDS 1909589), *Raj v. First Transit, Inc.* (Superior Court of
5 California in Sacramento, 34-2021- 00295895-CU-OE-GDS), *Marchbanks v. Torrid Administration,*
6 *Inc.* (Superior Court of California in San Diego, 37-2020-00008179-CU-OENC), *Taylor v. Populus*
7 *Group, LLC* (Southern District of California, 3:20-cv-00473-BAS-BLM), *Wilkerson v. Intuit, Inc.*
8 (Superior Court of California in San Diego, 37-2020-00030371-CU-OE-CTL, among others.

9 7. In addition, my office has been counsel of record in a number of wage and hour
10 Class/PAGA action lawsuits, including, *Moriana v. Viking River Cruises* (Superior Court of California
11 in Los Angeles, BC 687325), *Trevino v. Golden State FC LLC et al.* (Eastern District of California, 1:18
12 cv-00120-DAD (BAM)), *Garcia v. Statewide Traffic Safety and Signs, Inc.* (Superior Court of
13 California in Orange County, 30-2018-01011814-CU-OE-CXC), *Arellano v. Lopez & Arteaga, Inc. et*
14 *al.* (Superior Court of California in Santa Clara, 17CV313029), *Cruz v. Talentscale LLC* (Superior Court
15 of California in Riverside County, RIC1821842), *Tolbert v. Northbay Healthcare Corporation* (Superior
16 Court of California in Solano County, FCS051565), *Cruz v. Dignity Health dba Bruceville Terrace*
17 (Superior Court of California in Sacramento County, 34-2018-00245506), *Limon v. Circle K Stores, Inc.*
18 (Eastern District of California, 18-cv-01689-LJO-SKO), *Parra, et al. vs. Trinity Services Group, Inc.*
19 (Superior Court of California in Kern, JCCP5155), *Hernandez v. Clark Pacific* (Superior Court of
20 California in Yolo, CV- 2019-644), *Gomez v. The Regents of the University of California et al.* (Superior
21 Court of California in San Diego, 37-2019-00030873-CU-OE-CTL), *Larson v. Mark Twain Medical*
22 *Center* (Superior Court of California in Calaveras, 19CV44062) *Girard v. Office Depot Inc.* (Superior
23 Court of California in Santa Clara, 19CV351584), *Johnson v. Bakersfield Memorial Hospital, et al.*
24 (Superior Court of California in Kern BCV-19-102016), *Higginbotham et al. v. South East Employee*
25 *Leasing Services* (Eastern District of California, 2:20-CV-00575-KJM-DB) *Bailon v. LAFC Sports LLC*
26 (Superior Court of California in Los Angeles, 19STCV29518), *Hutchinson v. G6 Hospitality LLC dba*
27 *Motel 6* (Southern District of California, 3:20-cv-00270-LAB-AHG), *Powell v. St. Joseph Medical*
28 *Center* (Superior Court of California in San Joaquin, STK-CV-UOE-2019-0011155), *Jones v. Summit*

1 *Therapeutics Services Inc.* (Superior Court of California in Santa Clara, 19CV353991), *Barksdale v. UC*
2 *Davis Medical Center* (Superior Court of California in Sacramento, 00269829), *Springstead v. Recovery*
3 *Innovations Inc., et al.* (Superior Court of California in San Diego, 37-2020-00001555-CU-OECTL),
4 *Oceana v. Tri-City Medical Center* (Superior Court of California in San Diego, 37-2019-65323-CU-OE-
5 CTL), *Maldonado v. Sit 'N Sleep, Inc.* (Superior Court of California in Los Angeles, 19STCV41237),
6 *Taylor v. Populus Group, LLC* (Southern District of California, 3:20-cv-00473-BAS-BLM), *Lim v.*
7 *Seafood City, et al.* (Superior Court of California in Alameda, RG20066777), *Harisis v. Starbucks*
8 *Corporation* (Superior Court of California in Los Angeles, 20STCV11290), *Battle v. Safran Cabin*
9 (Superior Court of California in Orange, 30-2020- 01140831-CU-OE-CXC), *Smith v. Noia Residential*
10 *Services, Inc.* (Superior Court of California in Fresno, 20CECG01820), *Diaz v. Recon 360, LLC*
11 (Superior Court of California in Santa Clara, 20CV370603), *Rivas v. 8x8, Inc.* (Superior Court of
12 California in Santa Clara, 20cv374192), *Compton v. Broadbase, Inc.* (Superior Court of California in
13 Sacramento, 34-2020-00285501-CU-OE-GDS), *Marden v. CVS Pharmacy, Inc., et al.* (Superior Court
14 of California in Placer, S-CV-0045902), *Godwin v. St. Mary Medical Center Foundation, et al.*
15 (Superior Court of California in Los Angeles, 20STCV45671), *Tabera v. St. Elizabeth Community*
16 *Hospital, et al.* (Superior Court of California in San Francisco, CGC-21- 589691), *Morgan v. Candid*
17 *Care Co.* (Superior Court of California in San Francisco, 3:21-cv-01748- JSC), *Richardson v. Pegasus*
18 *Aviation Services, LLC* (Superior Court of California in San Mateo, 21-CIV-00292), *Newsome v.*
19 *Graybar Electric Company, Inc.* (Northern District of California, 4:21cv1000), *Terronez v. ST. JOHN'S*
20 *Regional Medical Center, et al.* (Superior Court of California in Ventura, 56- 2021-00551166-CU-OE-
21 VTA), *Butler v. PowerSchool Group, LLC* (Superior Court of California in Sacramento, 34-2021-
22 00303458), *Dale v. PCC Structural Inc., et al.* (Superior Court of California in Alameda,
23 RG21102183), *Horowitz v. Sky West Airlines* (Northern District of California, 3:21-cv-04674- MMC),
24 *Castillo v. Harmony Foods, LLC et al.* (Superior Court of California in Santa Cruz, 21CV00961),
25 *Wightman v. Cobham Advanced Electronic Solutions, Inc.* (Superior Court of California in San Diego,
26 37-2021-00038124-CU-OE-CTL), *Martin v. Air International US Inc.* (Superior Court of California in
27 Alameda, RG21098764), *Ziperman v. Parkway Motorcars Valencia Inc., et al.* (Superior Court of
28 California in Los Angeles, 21STCV31959), *Amiri v. Grewal Foods OC Sub, Inc. dba Subway* (Superior

1 Court of California in Los Angeles, 21STCV20426), *Valenzuela v. Network Medical Management, Inc.*
2 (Superior Court of California in Los Angeles, 21STCV39548), *Miles v. Chico Produce Inc.* (Superior
3 Court of California in Sacramento, 00301881), *Hoelzel v. Starbucks* (Superior Court of California in Los
4 Angeles, 21STCV37838), *Randle- Tatum v. Hopdoddy Burger Bar, Inc.* (Superior Court of California in
5 Los Angeles, 21STCV21015), *Magallan v. SW Ingredients Holdings, LLC et al.* (Superior Court of
6 California in Fresno, 21CECG01943), *Turner v. Smithfield Distribution, LLC* (Superior Court of
7 California in Los Angeles, 21STCV23414), *Martin v. American Custom Private Security Inc.* (Superior
8 Court of California in San Joaquin, STK-CV-UOE-2021-8213), *Brito v. Brothers International Desserts*
9 *Inc. et al.* (Superior Court of California in Orange, 30-2022-01242515-CU-OE-CXC), *Chavis v.*
10 *Grocery Outlet, Inc.* (Superior Court of California in Sacramento, 34-2021-00309003-CU-OE-GDS),
11 *Randall v. YRC Inc., et al.* (Superior Court of California in San Bernardino, CIVSB2205968), *Carroll v.*
12 *LA Family Housing Corporation* (Superior Court of California in Los Angeles, 20STCV04474),
13 *Wilkerson v. Intuit, Inc.* (Superior Court of California in San Diego, 37-2020-00030371-CU-OE-CTL),
14 *Teer v. Sabert Corporation* (Superior Court of California in Riverside, RIC1905847), *Felix v. Wm.*
15 *Bolthouse Farms, Inc.* (Eastern District of California, 1:19-CV-00312-AWI-JLT), *Soto v. O'Reilly Auto*
16 *Enterprises, LLC* (Central District of California in Riverside, 5:20-cv-00214-JGB-KK), *Kane v.*
17 *Smithfield Direct, LLC* (Central District of California, 21-CV-04832 PA (JCx)), *North v. Jones Lang*
18 *Lasalle Americas, Inc.* (Superior Court of California in San Diego, 37-2019-00028271-CU-OE-CTL),
19 among others.

20 8. Although I am experienced in class and PAGA actions, I associated in as co-counsel on
21 this case with Diversity Law Group, P.C., which has a great deal of experience in wage and hour class
22 and PAGA actions, and together our firms have and will continue to aggressively and competently
23 represent the named plaintiffs and State's interests in this case.

24 9. In my opinion, based on my experience as outlined above, the settlement is fair,
25 reasonable, and adequate and should receive this Court's approval.

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10. By the time this case is fully administered, I will have spent more than 34.90 hours on this matter. The hours spent to date total 33.40 hours (excluding estimated 1.50 hours of post-approval administration of the settlement), which consist of the following:

- 31.10 hours conducting pre-litigation investigation, including meetings and/or calls with the Plaintiffs and researching the Defendants and/or speaking to aggrieved employees Plaintiffs identified regarding Plaintiffs' factual contentions, and conducting legal research regarding Plaintiffs' claims;
- 2.30 hours related to litigation and/or hours related to settlement and approval of the settlement; and
- Approximately 1.5 hours (estimate) related to post-approval settlement administration including but not limited to answering questions from aggrieved employees regarding their payment.

11. My hourly rate for class/PAGA action work is \$1,235.00. The lodestar value of the time I will have devoted to this case by the time this case is fully administered is **\$43,101.50** (34.90 hours x \$1,235.00).

12. My office has incurred **\$830.06** costs in this matter, which consist of document access fees for CaseAnywhere.

13. Plaintiffs have signed a fee-split agreement with their counsel for purposes of sharing any fees awarded by this Court. The fee-split is as follows 66 ⅔ % to Diversity Law Group, P.C. and 33 ⅓ % to D.Law, Inc.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 4th day of June 2026, at Pasadena, California.


Emil Davtyan