

D.LAW, INC.

Roman Shkodnik (SBN 285152)

r.shkodnik@d.law

Amanda Fazio (SBN 346350)

a.lindsay@d.law

Enoch J. Kim (SBN 261146)

e.kim@d.law

Antonia McKee (SBN 344511)

a.bliznets@d.law

250 N Madison Ave, 2nd Floor

Pasadena, CA 91101

Telephone: (818) 962- 6465

Facsimile: (818) 962-6469

[Additional Counsel listed on following page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SOLANO

BLANCA RIVERA and GUSTAVO
HERNANDEZ, on behalf of themselves and
others similarly situated,

Plaintiffs,

v.

LEGENDARY STAFFING, INC. dba FOR
LEGENDARY STAFFING, a California
corporation; ATLANTIC SOLUTIONS
GROUP, INC., a Delaware Corporation;
EMPIRE WORKFORCE SOLUTIONS, an
entity of unknown form; BARONHR, LLC
dba THE BARONHR FAMILY OF
STAFFING COMPANIES, a Delaware limited
liability company; VALLEY FINE FOODS
COMPANY, LLC, a California limited
liability company; and DOES 1 through 50,
inclusive,

Defendants.

Case No. CU23-01485

CLASS ACTION

Assigned for All Purposes To:

Hon. Stephen Gizzi

Dept.: 3

**DECLARATION OF DAVID YEREMIAN IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT**

Hearing Information:

Date: September 18, 2026

Time: 9:00 a.m.

Dept.: 3

Original Complaint Filed: May 17, 2023

First Amended Complaint Filed: August 23, 2023

Trial Date: None Set

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DAVID YEREMIAN & ASSOCIATES, INC.

David Yeremian (SBN 226337)
d.yeremian@d.law
250 N Madison Ave, 2nd Floor
Pasadena, CA 91101
Telephone: (818) 962- 6465
Facsimile: (818) 962-6469

Attorneys for Plaintiff GUSTAVO HERNANDEZ on
behalf of himself and others similarly situated

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I, David Yeremian, declare as follows:

1. I am an attorney licensed and admitted to practice before all courts of the State of California, the United States District Court for the Central, Southern, Eastern, and Northern Districts of California, and the Ninth Circuit Court of Appeals. I am a managing attorney of D.Law, Inc., counsel for Plaintiff Gustavo Hernandez (“Plaintiff”) on behalf of himself and similarly situated employees of Defendant Valley Fine Foods Company, LLC (“Defendant”). I and my firm are referred to herein as Class Counsel. I have personal knowledge of the facts herein and if called as a witness, I could and would competently testify.

2. I graduated from UC Berkeley in 1997 and received my law degree and MBA from UCLA in 2001. I am a member of the Los Angeles County Bar Association and the California Employment Lawyers Association. I have been honored as a Super Lawyers Rising Star in 2009, 2010, 2012-2015. I have been named and honored as a Super Lawyer since 2016.

3. I am experienced in prosecuting employment matters, particularly class actions. In addition to the present case, I am also class counsel for dozens of other putative wage-and-hour class-action lawsuits pending in various state and federal jurisdictions throughout California.

4. My extensive experience in litigating employment wage and hour matters has been integral in identifying legal issues, evaluating the strengths and weaknesses of a case, and generally negotiating fair and reasonable class action settlements. Practice in the narrow field of wage and hour litigation requires skill and knowledge concerning the constantly evolving substantive law (state and federal), as well as the procedural law of class action litigation. In this action, I am fully equipped to use the skills and knowledge I have developed through more than a decade of prosecuting and defending wage and hour class actions to fairly and adequately represent the interests of the Class. Therefore, on the account of my resources, experience, and knowledge, I am well qualified to act as Class Counsel and represent Plaintiff and the putative Class Members in this action.

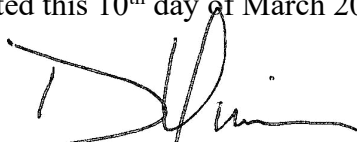
5. In the last several years I have had several contested class cases certified. When necessary, we pursue cases on appeal. Owing to my experience, I am well qualified to evaluate the

1 class claims in this action, to evaluate settlement v. trial and defenses raised. I have negotiated
2 over 100 class action settlements, including many involving the same issues presented in this case.
3 A selection of cases wherein I have served as lead or co-lead class counsel includes: *Galavis v.*
4 *Patina Restaurant Group, LLC* (LASC BC375225; class size approx. 10,000; co-lead counsel);
5 *Milford v. ADT Security Services, Inc.* (CACD CV08-2236; class size approx. 2,000; lead
6 counsel); *Carreon v. Wolfgang Puck Catering and Events, LLC* (LASC BC398569; class size
7 approx. 1,400; lead counsel); *Fluke v. RFG Oil, Inc.* (LASC BC403354; class size approx. 1,400;
8 lead counsel); *Urena v. Camachos Restaurant* (LASC BC365913; class size approx. 887; lead
9 counsel); *Smith v. Rio Rancho Pontiac GMC Buick Inc.* (LASC BC391187; class size approx. 860;
10 lead counsel); *Callela v. Dolce Group* (LASC BC364711; class size approx. 600; lead counsel);
11 *Vasquez v. The Hollywood Pig n Whistle LP* (LASC BC335075; class size approx. 600; lead
12 counsel); *Goldman v. Aorta Restaurant Operating LP* (LASC BC379688; class size approx. 300;
13 lead counsel); *Sink-Crilly v. Centex Homes* (CACD CV09-2476; class size approx. 250; lead
14 counsel); *Utley v. Cranbrook Partners Inc.* (LASC BC392813; class size approx. 200; lead
15 counsel); *Garcia v. California Credits Group* (LASC BC353213; class size approx. 160; lead
16 counsel); *Afanasyev v. Miller Infiniti, Inc.* (LASC BC350788; class size approx. 160; lead
17 counsel); *Morris v. Gymboree, Inc.* (LASC BC393270; class size approx. 150; lead counsel);
18 *Ortega v. AJC Sandblasting, Inc.* (LASC BC378806; class size approx. 140; lead counsel);
19 *Lulejyan v. Jim Falk Motors of Beverly Hills, Inc.* (LASC BC398459; class size approx. 72; lead
20 counsel); *Rylko v. The Griddle Café, Inc.* (LASC BC386126; class size approx. 70; lead counsel);
21 *Healy v. Siemens IT Solutions and Services, Inc.* (Santa Clara Superior Court 108CV113479; class
22 size approx 60; lead counsel).

23 6. I and my firm have no conflicts of interest with the administrator or Class.

24 7. I declare under the penalty of perjury under the laws of the State of California that
25 the foregoing is true and correct.

26 Executed this 10th day of March 2026 at Pasadena, California.

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28 _____
David Yeremian