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Attorneys for Plaintiffs and the Putative Class

Additional counsel on the following page

3 SUPERIOR COURT OF THE STATE OF CALIFORNIA

4 FOR THE COUNTY OF SAN BERNARDINO

5 ELSA CHAVEZ and ORLANDO A. ROJAS, on
6 behalf of themselves and all others similarly
7 situated,

8 Plaintiffs,

9 v.

10 TLD LOGISTICS SERVICES, INC., a Tennessee
11 corporation; and DOES 1-100, inclusive.

12 Defendants.

CASE NO.: CIVSB2314330

Assigned to the Hon. Wilfred J. Schneider Jr.

**DECLARATION OF SAM REZVANI IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

HEARING INFO

Date: January 7, 2025

Time: 8:30 a.m.

Dept.: S32

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1 deal. Additionally, I supported Stroock's litigation teams by providing legal research support, due
2 diligence support, and occasionally drafting legal motions and moving papers.

3 8. In 2018, I established my own practice, initially advising almost exclusively in legal
4 transactional matters, but soon expanding into plaintiff-side employment litigation.

5 9. As part of my practice, I am co-counseling with experienced labor and employment
6 litigation attorneys. For the last four (4) years, with respect to my litigation matters, I have
7 exclusively co-counseled with the Bokhour Law Group, PC, the Eshaghian Law Group, PC, and
8 Bansal Law, PC—all experienced plaintiff-side labor and employment law firms based in Los
9 Angeles, California. I have been retained to represent plaintiffs in class action cases, as well as
10 single-plaintiff discrimination, harassment, retaliation and wrongful termination cases.

11 10. Mehrdad Bokhour, Esq., of the Bokhour Law Group, PC, co-counsel in this matter,
12 has specialized in representing plaintiffs in a variety of class action wage & hour employment
13 litigation and has successfully settled dozens of class action and PAGA cases before courts
14 throughout California. I rely on the technical knowledge, experience and litigation strategizing of
15 Mr. Bokhour and other employment attorneys with respect to any counseling I provide on
16 employment litigation matters, including without limitation, any matters counseled in the class
17 action context. I will continue to do so until I have gained the experience necessary to adequately
18 represent a putative class without the further need to rely on co-counsel.

19 11. I have participated primarily in investigating the claims, collaborating with my co-
20 counsel researching the facts and legal theories, reviewing, and analyzing the documents and data
21 produced in advance of mediation, and participating in mediation and settlement approval of the
22 case, among other tasks.

23 12. In addition to the instant case, I have represented plaintiffs in over two dozen
24 employment litigation cases in my relatively short employment litigation tenure. Most have been
25 settled via pre-litigation private mediation.

26 13. My firm, together with co-counsels Mehrdad Bokhour, Esq. of Bokhour Law Group
27 PC, and Manny Starr and Adam Rose of Frontier Law Center, have the experience, resources, and
28 means necessary to allow us to provide adequate representation as Class Counsel to all class

1 members in this litigation. Class Counsel are respected members of the California Bar with strong
2 records of vigorous and effective advocacy of their clients. Both Class Counsel and Plaintiffs were
3 prepared to litigate the claims in this action, but they strongly and unequivocally support the
4 proposed Settlement as being in the best interest of the Settlement Class based on the circumstances
5 referenced in the Settlement Agreement.

6 14. In compliance with the California Rules of Professional Conduct, Plaintiffs signed a
7 retainer agreement that includes a fee sharing agreement.

8 I declare under penalty of perjury under the laws of the state of California that the foregoing
9 is true and correct on this 2nd day of December 2024, at Los Angeles, California.

10
11 By: 
12 Sam Rezvani, Esq.
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