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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

LUIS RAMIREZ and ANA BALAGTAS, individuals, on behalf of themselves and on behalf of all persons similarly situated, and on behalf of the State of California, as a private attorney general,

Plaintiffs,

v.

CLASSIC RESIDENCE MANAGEMENT LIMITED PARTNERSHIP, a Limited Partnership; and DOES 1 through 50, inclusive,

Defendants.

Case No.: 37-2023-00039329-CU-OE-CTL

DECLARATION OF JOHN G. YSLAS IN SUPPORT OF UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT

Hearing Date: November 13, 2026
Hearing Time: 9:30 a.m.

Judge: Hon. Marcella O. McLaughlin
Dept.: 72

Date Action Filed: September 11, 2023
Trial Date: Not set

DECLARATION OF JOHN G. YSLAS

I, John G. Yslas, hereby declare as follows:

1. I am an attorney at law licensed to practice before all of the courts of the State of California. I am a senior partner at Wilshire Law Firm, PLC ("WLF"), counsel for Plaintiff Ana Balagtas ("Plaintiff Balagtas"), and, together with Blumenthal Nordrehaug Bhowmik De Blouw LLP ("BNBD"), proposed Class Counsel in this matter. I am thoroughly familiar with and have personal knowledge of all of the facts set forth herein.

2. I submit this declaration in support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Settlement.

WLF's Qualifications

3. Plaintiff Balagtas is represented by WLF, which is associated with BNBD as co-counsel for Plaintiffs. The attorneys at WLF performed significant work and expended litigation costs in prosecuting this matter with no guarantee of payment.

4. WLF was selected by Best Lawyers and U.S. News & World Report as one of the nation's Best Law Firms since 2020 and is comprises of more than 100 attorneys and over 600 employees. WLF is actively and continuously practicing in employment litigation, representing employees in both individual and class actions in both state and federal courts throughout California.

5. WLF is qualified to handle this action because its attorneys are experienced in litigating Labor Code violations in individual, class action, and representative action cases. WLF has handled, and is currently handling, numerous wage and hour class action lawsuits, as well as class actions involving consumer rights and data privacy litigation.

6. I graduated from the University of California, Santa Barbara with High Honors in 1991 with Bachelor of Arts degrees in Psychology. I received my Juris Doctor from UCLA Law School in 1996.

7. Upon graduating from law school in 1996, I worked for a boutique law firm practicing general litigation which included employment law matters. Since 2000 (that is, more than 25 years) my practice has been exclusively focused on labor and employment matters including handling wage and hour class, collective and representative actions (including the California Private Attorneys

General Act, or "PAGA"), including in the international law firms of Morgan, Lewis & Bockius LLP (where I was a senior associate), Foley & Lardner LLP (where I was a partner and a national Vice Chair of the Labor and Employment Group), Norton Rose Fulbright LLP (where I was a partner) and Seyfarth Shaw LLP (where I was a partner and member of the Wage and Hour Practice Group). During my time at these law firms, I was the primary attorney or took a major leading role in defending employers on numerous wage and hour class, collective and representative actions.

8. In late June 2022 I left Seyfarth Shaw LLP and joined my current firm, Wilshire Law Firm, PLC, to represent plaintiff employees. I have been and am handling many wage and hour class and representative actions litigating such matters on behalf of plaintiff employees in numerous Superior Courts and District Courts. From matters representing both plaintiffs and defendants, I have successfully mediated the resolution of many wage and hour class, collective, and representative actions. Just since starting to settle cases in late April 2023 I have already successfully mediated matters in which I have been counsel or co-counsel resulting in **over $300 million** in settlements with numerous upcoming mediations scheduled. In those and numerous other matters, I have managed and assisted with the litigation and settlement of many wage and hour PAGA and class actions. In those actions, I performed similar tasks as those performed in the course of prosecuting this action. Indeed, I recently tried and prevailed in achieving a jury verdict in a certified wage and hour class action in the matter of *Aguilar-Flores v. Javier's – CC LLC*, Los Angeles County Superior Court, Case No. 19STCV36438 (settled after verdict).

9. I have received numerous awards for my legal work. For example, from 2015 to 2018, I was listed in Los Angeles Super Lawyers for Employment Litigation (Thomson Reuters). I have also served on numerous prominent boards and in other leadership positions, including serving as Southern California Regional President for the Hispanic National Bar Association and on the board of directors of the Mexican American Bar Foundation. I also previously served on the 5-member Los Angeles Civil Service Commission, which generally oversees the personnel decisions for the City of Los Angeles.

10. I have also published numerous blogs and articles on labor and employment issues including on wage and hour issues. For example, I published "Headline News: Wal-Mart v. Dukes-

Impact on Class Action Litigation" (while a partner with Foley & Lardner LLP) and "Are You Really Protected From Wage-and-Hour Successor Liability in an Asset Purchase" (while a partner with Seyfarth Shaw LLP). I have also been a presenter at numerous conferences, including being a presenter involving the "Employment Law Update" at a National Employment Law Council conference.

11. Eugene Zinovyev is a Junior Partner at WLF. He graduated from the University of California, Berkeley with a Bachelor of Arts in Political Economy of Industrial Societies, and received his Juris Doctor from the University of California, San Francisco School of Law in 2009. He has practiced employment and wage and hour law since then on both the plaintiff and defense sides. Mr. Zinovyev has tried multiple jury cases to verdict as well as numerous bench trials. He has also briefed published appellate court decisions in both state and federal court. Mr. Zinovyev is admitted to practice before all Federal District Courts in California as well as the 9th Circuit Court of Appeals. He is also a member of the California Employment Lawyers Association. He has mediated and settled dozens of class and representative actions as well as individual civil matters.

12. John Brown is an Associate Attorney at WLF. He was admitted to practice law in the State of California in 2004. Mr. Brown graduated from UC Berkeley with a Bachelor of Arts and received his Juris Doctor from UCLA School of Law. His current practice has been focused on class action employment law. Mr. Brown has participated in dozens of settlements totaling tens of millions of dollars, from initial client evaluation through to final approvals from the court.

13. Gabriella Solé is an Associate Attorney at Wilshire Law Firm, PLC. She was admitted to practice law in the State of California in 2022. Ms. Solé graduated from University of California, Los Angeles with a Bachelor of Arts in Sociology. She received her Juris Doctor from University of San Francisco, School of Law. During law school, she was a First Year Moot Court Director on the Moot Court Board. Since graduating, her practice has been mainly focused on wage and hour class action litigation.

14. WLF has no actual or potential conflicts of interest with Class Members or the proposed Administrator, ILYM Group, Inc, or the proposed Cy Pres Recipient, the Alzheimer's

Association.

15. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

16. [Plaintiffs' counsel] timely submitted to the Labor and Workforce Development Agency ("LWDA") the PAGA notice[s], the Operative Complaint, and the Settlement Agreement, as required by Labor Code sections 2699.3, subdivision (a), and 2699, subdivision [(l)(1)–(2)]. [The Settlement Agreement was submitted to the LWDA on October 19, 2026, the same day this motion was filed.]

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

Executed on October 15, 2026 at Los Angeles, California.



John G. Yslas