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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

GLORIA ARISTONDO, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

vs.

PROSPERA MANAGEMENT INC., a
California corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 30-2023-01334274-CU-OE-CXC

[Assigned for all purposes to the Hon. Layne H.
Melzer, Dept. CX102]

**DECLARATION OF NAZGOLE HASHEMI IN
SUPPORT OF PLAINTIFF'S MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE ATTORNEYS
GENERAL ACT OF 2004**

Date: July 10, 2025

Time: 2:00 P.M.

Dept.: CX102

Action Filed: June 30, 2023

Trial Date: None Set

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I, Nazgole Hashemi, declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am with the law firm LegalAxxis, Inc., counsel of record for Plaintiff Gloria Aristondo (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

ATTORNEY EXPERIENCE

2. I am one of the primary attorneys on this matter. My qualifications are as follows: I graduated from UC Berkeley in 2009 at 19 years old. During my time at UC Berkeley, I served as the co-founder and instructor of an Ethic Studies course offered to students for two semesters. I then received a full tuition scholarship and graduated from Southwestern Law School in 2013. During my time at Southwestern Law School, I served on the Moot Court Honors Program and received various awards, including the Witkin Award for Academic Excellence in Legal Analysis, Writing, and Skills (Appellate Advocacy), Brief Finalist Writer Award, and Public Interest Grant. I also served as a Teaching Assistant for Business Associations, Research Assistant for faculty members, and as an intern at the Edmund D. Edelman Children's Courthouse for one summer.

3. In Spring 2018, I began teaching as an Adjunct Associate Professor at Southwestern Law School and was later promoted to Adjunct Professor. I have taught Securities Regulation since Spring 2018, Corporate Mergers and Acquisitions (Joint JD/MBA course) since Spring 2023, and Negotiation and Dispute Resolution in Spring 2022. I have also published numerous articles: 1) *Unfairly Interchangeable: A Guide for Litigating the Alter Ego Doctrine and Proposal to Codify the Doctrine in California* (2024 Pepperdine Law School Journal of Business, Entrepreneurship, and the Law,); 2) *Protected but Prejudiced: Redefining a Corporation's Ability to Pursue or Defend Litigation Without Counsel* (2022 Loyola of Los Angeles Law Review); 3) *Don't Let Them Fool Ya: An Examination of Regulation Crowdfunding as a Framework for Federal Protection Against Online Dating Risks* (Co-authored with Tannaz H. Hashemi, 2019 University of San Francisco Law Review); 4) *Follow the Yellow Brick Road: A Guide for Improving Issuer and Investor Appreciation of Risks in Creative Arts Crowdfunding Campaigns* (Co-authored with

1 Tannaz H. Hashemi, 2017 Michigan State University Journal of Business & Securities Law); and
2 5) *Crowdfunding in Wonderland: Issuer and Investor Risks in Non-Fraudulent Creative Arts*
3 *Campaigns Under the JOBS Act* (Co-authored with Michael M. Epstein, 2016 American
4 University Business Law Review).

5 4. In December 2013, I co-founded LegalAxxis, Inc., where I primarily practice civil
6 litigation. I routinely litigate and successfully resolve to client satisfaction many different types of
7 cases across the civil litigation spectrum, including but not limited to employment, wage and hour,
8 business and contract, landlord/tenant, HOA, personal injury, and construction cases. I have served
9 as the first chair in an approximately one month-long jury trial on the plaintiff's side against the
10 California State University and the first chair in a bench trial on the defense side. I have also served
11 as lead counsel in various appeals before the California Court of Appeal and Ninth Circuit. I was
12 named a Southern California Rising Star by Super Lawyers from 2020 to 2023.

13 5. I have contributed to the legal community by providing *pro bono* services to the
14 Alliance for Children's Rights and participating as a moderator or speaker in various CLE
15 programs, such as: *Key Developments in Employment Law 2024, 2023, and 2022* (University of
16 California CEB); *Settlement Agreements in Employment Cases: Understanding Tax Issues and*
17 *Key Provisions* (BHBA 2024); *The Future of PAGA After the California Supreme Court's Decision*
18 *in Adolph v. Uber Technologies* (BHBA 2023); *Understanding the Alter Ego Doctrine: Holding*
19 *Principals Responsible for Corporate Debts* (University of California CEB 2023); *Settling PAGA*
20 *and Class Action Cases* (BHBA 2023); *Understanding PAGA After the U.S. Supreme Court's*
21 *Decision in Viking River Cruises* (BHBA 2022); and *Update on Employee Rights and Returning*
22 *to Work During the COVID-19 Era* (BHBA 2021).

23 6. To date, I have incurred at least approximately 75.4 hours in connection with the
24 litigation of this lawsuit. Attached hereto as **Exhibit A** is a chart summarizing the amount of work
25 I have incurred to date on this matter.

26 7. My hourly rate at this time, based on approximately 12 years of practicing civil
27 litigation and running my own law firm, is \$750.00. Accordingly, I anticipate the amount of my
28 fees incurred in this case to date to be approximately \$56,550.00 (75.4 hours x \$750.00 per hour).

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct. Executed on June 11, 2025, at Los Angeles, California.

3 *Nazgole Hashemi*

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5 _____
Nazgole Hashemi

EXHIBIT A

Aristondo v. Prospera Management Inc., et al.
Time and Task Chart for Nazgole Hashemi

Hours	Description of Work
10.5	Factual investigation; interviews with client; review and revise PAGA letter; confer with co-counsel and client to prepare for filing of action; confer and strategize with co-counsel re potential prior actions filed against Defendant
1.1	Review and revise complaint drafted by co-counsel
2.5	Review courtroom rules re case management conference; meet and confer with opposing counsel for case management conferences; draft and review plaintiff's case management statement and subsequent joint statements; review minute order from court
3.1	Review and analyze defense position re class action waiver; confer with co-counsel; review and revise joint stipulation for leave to file First Amended Complaint; review and revise First Amended Complaint
2.2	Review and research defense position re compelling arbitration; confer with co-counsel; meet and confer with opposing counsel re compelling arbitration
6.8	Review and revise first set of written discovery for Superior Court action; confer with co-counsel re same; analyze and review Defendant's objections to written discovery in Superior Court action; draft meet and confer correspondence; meet and confer with opposing counsel re discovery responses and filing of motion to compel arbitration
6.5	Review Defendant's motion to compel arbitration; confer with co-counsel re opposition to motion; draft and revise opposition to motion; review Defendant's reply papers; review tentative ruling; attend hearing on motion
2.5	Confer with co-counsel re arbitration demand; review and revise arbitration demand; meet and confer with opposing counsel re case management conference for arbitration; review and revise joint statement for conference; attend case management conference; review scheduling order for arbitration
3.5	Draft and revise claimant's initial disclosures for arbitration; confer with co-counsel re production and initial disclosures; gather and organize production of documents; review respondent's initial disclosures and production of documents
4.5	Review and revise first set of written discovery in arbitration; review respondent's responses to written discovery; confer with co-counsel and draft meet and confer letter re deficiencies; discussions with opposing counsel re deficiencies, staying discovery disputes, and resolution of case
7.5	Meet and confer with opposing counsel regarding first mediation; review and revise stipulation to continue case management conference and subpoena deadline in arbitration due to mediation; confer with co-counsel re informal discovery request in connection with mediation; analyze and review Defendant's data production for mediation; confer with co-counsel and expert re data production; review expert's analysis re data

2.8	Draft and revise mediation brief
7.5	Prepare for and attend mediation
3.4	Draft and review MOU following mediation; confer with co-counsel re MOU terms
1.5	Prepare and revise amended PAGA notice; confer with co-counsel and opposing counsel re amended notice
3.1	Review and revise long-form settlement agreement and supporting declaration; confer with co-counsel and opposing counsel regarding terms of settlement and supporting declaration
1.7	Prepare and revise Second Amended Complaint; confer with co-counsel and opposing counsel re SAC; review and revise joint stipulation re settlement and filing of SAC
4.7	Review and revise motion for approval of PAGA settlement and related documents; prepare and revise supporting declaration
TBD	Attend hearing on motion for approval of PAGA settlement
TBD	Confer and correspond with settlement administrator, co-counsel, and opposing counsel re administration of settlement; review reports from settlement administrator
<u>At least</u> <u>75.4</u>	<u>TOTAL HOURS</u>