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12 Attorneys for Plaintiff
Linda Medina and the Proposed Class

13
14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF LOS ANGELES**

16 LINDA MEDINA, individually, and on
17 behalf of others similarly situated, and
18 aggrieved employees pursuant to the
California Private Attorneys General Act;

19 Plaintiff,

20 vs.

21 EASY HEALTH, INC., a Delaware
22 corporation; EASY HEALTH MEDICAL
SOLUTIONS, P.C., a California
23 corporation; and DOES 1 through 100,
24 inclusive,

25 Defendants.

Case No.: 23SMCV04232

**DECLARATION OF VARTAN MADOYAN
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Information:

Date: April 13, 2026
Time: 9:00 AM
Dept.: I
Judge: Hon. Mark H. Epstein

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1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Linda Medina (“Plaintiff”). The facts set forth in this declaration are within my personal knowledge or based on information and belief, and if called as a witness, I could and would competently testify thereto.

2. For over a decade, Lawyers for Justice, PC has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers for Justice, PC is attorney of record in dozens of employment-related putative class actions in both state and federal courts in the State of California. Lawyers for Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act (“PAGA”) representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. Lawyers for Justice, PC has recovered (sometimes in association with other law firms) millions of dollars on behalf of thousands of individuals in California. Below is a summary of the experience and qualifications of attorneys at Lawyers for Justice, PC (additional staff have also worked on the matter).

3. Edwin Aiwarzian is the Managing Member and Shareholder of Lawyers for Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal education and training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior

1 Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA
2 Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University.
3 From approximately September 2002 to approximately December 2002, he served as a Judicial
4 Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the
5 Ninth Circuit. From approximately June 2002 to approximately August 2002, he served as a
6 Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
7 Appellate District. In December of 2004, he obtained a license to practice law from the California
8 State Bar. Since in or around October of 2008, through his work at Lawyers for Justice, PC, he
9 has almost exclusively focused on the prosecution of consumer and employment class actions.
10 While employed by Lawyers for Justice PC, he has argued over one hundred (100) motions, taken
11 or defended over one hundred fifty (150) depositions, prepared dozens of expert witnesses for
12 deposition or trial, and attended over one hundred seventy-five (175) mediations. Together with
13 other attorneys at the firm, and in some cases in conjunction with co-counsel, he has successfully
14 litigated cases involving the executive, administrative, and other overtime exemptions to the State
15 of California and federal overtime compensation requirements. Under his supervision, Lawyers
16 for Justice, PC has successfully obtained class certification by contested motion practice in
17 approximately fifteen (15) cases in the last decade and litigated over 1,000 class action or
18 representative action cases.

19 4. Arby Aiwazian is a Member and Shareholder of Lawyers for Justice, PC. He
20 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
21 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
22 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
23 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
24 From approximately August 2008 to approximately December 2008, he served as a Judicial
25 Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth
26 Circuit. He was admitted to practice law in California in 2010. He is admitted to practice before
27 all courts of the State of California and all United States District Courts in the State of California.
28 He has worked on many wage-and-hour class action and representative action cases, taking the

1 lead in taking and defending depositions, arguing motions, and attending mediations. He has
2 played an integral role in preparing matters for class certification, including and not limited to,
3 successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court
4 Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court
5 Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case
6 No. RG13680477). Under his supervision, dozens of class action or representative cases have
7 resulted in settlements that have been granted court approval, including and not limited to, those
8 listed in paragraph 7 herein. He has handled over one hundred and fifty (150) mediations and
9 worked on over two hundred and fifty (250) class action or representative action cases which have
10 resulted in settlement.

11 5. Joanna Ghosh is a Senior Member of Lawyers for Justice, PC. She received a
12 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of
13 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from
14 Georgetown University Law Center in 2010. She is admitted to practice in California (since
15 2010) and in New York (since 2013) and is also admitted to practice in all U.S. District Courts in
16 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme
17 Court. She has taken and defended dozens of depositions and successfully handled motion
18 practice in class action cases regarding discovery (including and not limited to, regarding class
19 contact information), class certification (both contested class certification and stipulated class
20 certification), arbitration agreements, coordination, and intervention. She has successfully
21 handled briefing and oral argument on appeal and obtained notable decisions regarding the Private
22 Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential*
23 *Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017),
24 cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. She has
25 significant experience with class actions, including and not limited to working on cases to obtain
26 class certification through contested motion practice and working on cases in the post-certification
27 stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial
28 preparation in conjunction with co-counsel in a case involving a certified class consisting of

1 approximately 2,600 individuals). She also has extensive experience with class action and/or
2 representative action settlements, and has handled this process in over three hundred (300) cases.
3 Under her, Edwin Aiwasian, and Arby Aiwasian's supervision, the firm has handled the class
4 certification and court approval process for hundreds of class action and/or representative action
5 matters that have successfully resolved. She is a member of the California Employment Lawyers
6 Association.

7 6. I, Vartan Madoyan, am a Member of Lawyers for Justice, PC. I received my
8 Bachelor of Arts degree in Economics from the University of California, San Diego in 2007, and
9 a Juris Doctor degree from Loyola Law School in 2011, graduating with Cum Laude and Order
10 of the Coif honors. I am admitted to practice before all courts in the State of California and all
11 U.S. District Courts in California. I externed for the Honorable Victoria S. Kaufman of the United
12 States Bankruptcy Court, Central District of California, from June 2009 to August 2009. I
13 externed for the Honorable Gary A. Feess of the United States District Court, Central District of
14 California, from January 2010 to May 2010. From 2011 through and including the present, I have
15 practiced almost exclusively on complex wage and hour class action and PAGA action matters in
16 California. From October 2011 to June 2013, I was an Associate at Littler Mendelson's Century
17 City, California office, working for one of the largest employer-side labor and employment law
18 firms in the United States. From July 2013 to March 2014, I was an Associate at Sheppard,
19 Mullin, Richter & Hampton's Century City, California office. From March 2014 to July 2023, I
20 worked as an Associate and then as Counsel at Baker Hostetler LLP's Los Angeles office. From
21 August 2023 to the present, I have been a Member of Lawyers for Justice, PC. I have taken and
22 defended dozens of depositions and have successfully handled motion practice in class action and
23 PAGA cases regarding discovery (including and not limited to motions regarding class contact
24 information), class certification (both contested class certification and stipulated class
25 certification), dispositive motions, arbitration agreements, coordination, and intervention. I have
26 successfully handled a complex wage and hour class action and PAGA case through a trial verdict
27 in the matter of *Estrada v. Royalty Carpet Mills*, Orange County Superior Court, Case No. 30-
28 2013-00692890. I have also successfully handled briefing on appeal regarding employer efforts

1 to compel arbitration. *TitleMax of Cal. v. Pena*, California Court of Appeals for the Fifth District,
2 Case No. F084706 (Cal. Ct. App. March 28, 2023) (unpublished decision). Further, I have
3 extensive experience with settlements of class actions and PAGA actions and have handled and
4 supervised this process in over one hundred (100) cases.

5 **EXAMPLES OF RESULTS IN WAGE-AND-HOUR CLASS ACTION AND**
6 **REPRESENTATIVE ACTION CASES**

7 7. What follows are just a few examples of the type of results Lawyers for Justice,
8 PC (“LFJ”) has achieved on behalf of its clients:

9 a) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
10 and-hour class action against a major property management company involving allegations of
11 misclassification of various “manager” positions. On September 20, 2010, the court granted final
12 approval of the class action settlement. The Los Angeles County Superior Court Case Number is
13 BC400414.

14 b) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
15 and-hour class action against a national retailer of household items involving allegations of
16 misclassification of the “Assistant Store Manager” position. On October 28, 2010, the court
17 granted final approval of the class action settlement. The Los Angeles County Superior Court
18 Case Number is BC413498.

19 c) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
20 and-hour class action against a national property management company involving allegations of
21 misclassification of the “Property Manager” position. On May 23, 2012, the court granted final
22 approval of the class action settlement. The Los Angeles County Superior Court Case Number is
23 BC430918.

24 d) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
25 and-hour class action against a national retailer involving allegations of misclassification of the
26 “Store Manager” position. On June 10, 2011, the court granted plaintiffs’ motion for class
27 certification. On August 26, 2013, the court granted final approval of the class action settlement.
28 The Los Angeles County Superior Court Case Number is BC424012.

1 e) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-
2 and-hour class and PAGA representative action against a bank, involving allegations of
3 misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court
4 granted final approval of the class and PAGA representative action settlement. The Kern County
5 Superior Court Case Number is S-1500-CV-273194-LHB.

6 f) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-
7 and-hour class and PAGA representative action against a national wholesale distributor of
8 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
9 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
10 representative action settlement. The Sacramento County Superior Court Case Number is 34-
11 2012-00136285.

12 g) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-
13 and-hour class action against a multinational corporation that provides global workplace
14 solutions, involving allegations of misclassification of the “Operations Manager” position. On
15 September 16, 2014, the court granted plaintiff’s motion for class certification. The Los Angeles
16 County Superior Court Case Number is BC478769.

17 h) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-
18 and-hour class and PAGA representative action against a national retailer of household items, on
19 behalf of hourly-paid or non-exempt employees. On May 27, 2015, the court granted final
20 approval of the class and PAGA representative action settlement. The San Francisco County
21 Superior Court Case Number is CGC-13-532344.

22 i) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-
23 and-hour class and PAGA representative action involving allegations of misclassification of the
24 salaried residential “Property Manager” position. On September 17, 2015, the court granted
25 plaintiff’s motion for class certification. On October 20, 2017, the court granted final approval
26 of the class and PAGA representative action settlement. The Los Angeles County Superior Court
27 Case Number is BC474784.

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1 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
2 and-hour class and PAGA representative action against a national retailer of upscale hardware
3 and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the court granted
4 final approval of the class and PAGA representative action settlement. The Los Angeles County
5 Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial Council
6 Coordination Proceeding Number is 4794.

7 k) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
8 and-hour class action against a national retailer of apparel and fashion accessories, on behalf of
9 non-exempt employees. On August 5, 2016, the court granted final approval of the class action
10 settlement. The Los Angeles County Superior Court Case Number is BC488069.

11 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
12 and-hour class action against a national retailer of apparel, accessories, and home products,
13 involving allegations of misclassification of the “Department Manager” position. On August 12,
14 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class.
15 On August 6, 2019, the court granted final approval of the class action settlement. The Alameda
16 County Superior Court Case Number is RG13680477.

17 m) LFJ represented the plaintiff in a PAGA representative action against a real
18 estate and property management company, on behalf of non-exempt employees. On November 4,
19 2016, the court granted approval of the PAGA representative action settlement. The Orange
20 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

21 n) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
22 and-hour class and PAGA representative action against a full-service bank, on behalf of non-
23 exempt employees. On November 18, 2016, the court granted final approval of the class and
24 PAGA representative action settlement. The San Francisco County Superior Court Case Number
25 is CJC-13-004839 and the Judicial Council Coordination Proceeding Number is 4839.

26 o) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
27 representative action against a foodservice distributor, on behalf of non-exempt employees. On
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1 January 26, 2017, the court granted final approval of the class and PAGA representative action
2 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

3 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative action,
4 successfully opposed in the trial court, and briefed and argued an appeal with respect to the
5 employer's motion to compel arbitration, which resulted in a published opinion by the California
6 Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall Supply* (Cal.
7 App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S. Supreme Court
8 Docket No. 17-254). The Riverside County Superior Court Case Numbers are RIC1503952 and
9 RICJCCP5046, and the Judicial Council Coordination Proceeding Number is 5046.

10 q) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
11 and-hour class and PAGA representative action against a consumer packaging company, on
12 behalf of non-exempt employees. On March 10, 2017, the court granted final approval of the class
13 and PAGA representative action settlement. The Los Angeles County Superior Court Case
14 Number is BC590429.

15 r) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
16 and-hour class and PAGA representative action against a manufacturer of food service industry
17 supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final approval
18 of the class and PAGA representative action settlement. The Orange County Superior Court Case
19 Number is 30-2015-00810013-CU-OE-CXC.

20 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
21 and-hour class and PAGA representative action against a lumber and hardware company on
22 behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the class
23 and PAGA representative action settlement. The Orange County Superior Court Case Number is
24 30-2014-00747750-CU-OE-CXC.

25 t) LFJ represented the plaintiff in a wage-and-hour class and PAGA representative
26 action against a property management company, on behalf of non-exempt employees. On June
27 14, 2017, the court granted final approval of the class and PAGA representative action settlement.
28 The Los Angeles County Superior Court Case Number is BC586234.

1 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA representative
2 action against a food company on behalf of non-exempt employees. On June 30, 2017, the court
3 granted final approval of the class and PAGA representative action settlement. The Sacramento
4 County Superior Court Case Number is 34-2015-00175871.

5 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
6 representative action against a chocolate company on behalf of non-exempt employees. On July
7 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
8 The Alameda County Superior Court Case Number is RG15764300.

9 w) LFJ represented the plaintiff in a PAGA representative action, against the
10 parent company of several restaurants, on behalf of hourly-paid, non-exempt employees. On
11 October 18, 2017, the court granted approval of the PAGA representative action settlement. The
12 Los Angeles County Superior Court Case Number is BC569664.

13 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
14 representative action against a manufacturer of plastic containers on behalf of non-exempt
15 employees. On October 31, 2017, the court granted final approval of the class and PAGA
16 representative action settlement. The Los Angeles County Superior Court Case Number is
17 BC577233.

18 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
19 and-hour class and PAGA representative action against a bank on behalf of non-exempt
20 employees. On December 11, 2017, the court granted final approval of the class and PAGA
21 representative action settlement. The Los Angeles County Superior Court Case Number is
22 BC569646.

23 z) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
24 and-hour class and PAGA representative action against a property management company on
25 behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court granted final
26 approval of the class and PAGA representative action settlement. The Los Angeles County
27 Superior Court Case Number is JCCP4819 and the Judicial Council Coordination Proceeding
28 Number is 4819.

1 aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a
2 wage-and-hour class and PAGA representative action against a global provider of flexible office
3 space solutions. On February 15, 2018, the court granted final approval of the class and PAGA
4 representative action settlement. The Los Angeles County Superior Court Case Number is
5 BC498401.

6 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-
7 and-hour class action against a container manufacturer, on behalf of non-exempt employees. On
8 October 15, 2018, the court granted the plaintiff's motion for class certification. The Tulare
9 County Superior Court Case Number is VCU264528.

10 cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
11 representative action against a behavioral health service provider on behalf of non-exempt
12 employees. On November 13, 2018, the court granted final approval of the class and PAGA
13 representative action settlement. The Alameda County Superior Court Case Number is
14 RG16811450.

15 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
16 PAGA representative action against a global provider of products and services to the energy
17 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court
18 granted approval of the PAGA representative action settlement. The Kern County Superior Court
19 Case Number is S-1500-CV-280215-SDC.

20 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-
21 and-hour class action against a parking company on behalf of non-exempt employees. On
22 September 3, 2019, the court granted the plaintiff's motion for class certification and certified a
23 class. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial
24 Council Coordination Proceeding Number is 4886.

25 ff) LFJ, in association with co-counsel therein, represents the plaintiffs in a wage-
26 and-hour class and PAGA representative action against a bank on behalf of non-exempt
27 employees. On September 27, 2019, the court granted the plaintiffs' motion for class certification
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1 in part and certified a class. The Alameda County Superior Court Case Number is RG15757606
2 and the Judicial Council Coordination Proceeding Number is 4921.

3 gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a
4 wage-and-hour class and PAGA representative action against a national retailer of apparel and
5 fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted
6 the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the
7 court granted final approval of the class and PAGA representative action settlement. The
8 Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

9 hh) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-
10 and-hour class and PAGA representative action against a medical equipment supplier on behalf
11 of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion for
12 class certification and certified a class. The San Bernardino County Superior Court Case Number
13 is CIVDS1505744.

14 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
15 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed
16 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
17 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
18 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted
19 approval of the PAGA representative action settlement. The San Diego County Superior Court
20 Case Number is 34-2015-00175330.

21 jj) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-
22 and-hour class and PAGA representative action against a large national drug testing laboratory
23 on behalf of non-exempt employees. On February 21, 2020, the court granted the plaintiff's
24 motion for class certification and certified a class. The San Diego County Superior Court Case
25 Number is 37-2018-00019611-CU-OE-CTL.

26 kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a wage-
27 and-hour class and PAGA representative action against a national retailer of sportswear, footwear,
28 and camping equipment on behalf of non-exempt employees. On March 16, 2020, the court

1 granted in part the plaintiff's motion for class certification and certified a class. The Riverside
2 County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the Judicial
3 Council Coordination Proceeding Number is 4930.

4 ll) LFJ, in association with co-counsel therein, represents the plaintiffs in a wage-
5 and-hour class action against manufacturer and supplier of power products and services on behalf
6 of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion for
7 class certification and certified a class. The San Diego County Superior Court Case Number is
8 37-2015-00025968-CU-OE-CTL.

9 mm) LFJ represents the plaintiff in a wage-and-hour class action against a
10 nutritional products manufacturer on behalf of non-exempt production line employees. On
11 December 13, 2021, the court granted the plaintiff's motion for class certification in part and
12 certified a class. The Solano County Superior Court Case Number is FCS051001.

13 nn) LFJ represents the plaintiffs in a wage-and-hour class action against a
14 manufacturer and distributor of commercial dish and glass cleaning machines and supplies for the
15 restaurant and hospitality industries, on behalf of hourly-paid or non-exempt employees. On July
16 13, 2023, the court granted the plaintiffs' motion for class certification and certified a class. The
17 Los Angeles County Superior Court Case Number is BC707670.

18 **SUMMARY OF WORK PERFORMED**

19 8. Several attorneys at Lawyers *for* Justice, PC have worked on this matter since the
20 inception of Plaintiff's claims. Lawyers *for* Justice, PC and Domb & Rauchwerger LLP
21 (collectively referred to as "Class Counsel") have worked cooperatively to achieve a global
22 settlement resolution of the claims filed by Plaintiff.

23 9. Collectively, Class Counsel investigated the veracity, strength, and scope of the
24 claims, and worked on preparing Plaintiff's action for class certification and trial, prior to reaching
25 a settlement in this action. Plaintiff's action has involved extensive and ongoing investigations,
26 research, and informal discovery into legal and factual issues. Class Counsel obtained
27 information from Plaintiff, reviewed and analyzed a volume of information, documents, and data
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1 obtained from Plaintiff, Defendant, and other sources, researched applicable law, and undertook
2 analyses and calculations of the value of claims, damages, and penalties exposure.

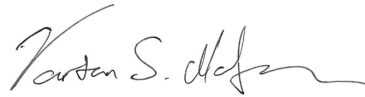
3 10. On July 3, 2023, Plaintiff submitted a letter to the Labor and Workforce
4 Development Agency alleging various violations of the California Labor Code. On September 7,
5 2023, Plaintiff filed a lawsuit alleging a single cause of action for violation of PAGA, alleging
6 violations for failing to pay overtime, provide compliant meal periods, provide compliant rest
7 periods, failing to pay minimum wages, failing to timely pay wages upon termination, failing to
8 timely pay wages during employment, failing to provide accurate wage statements, failing to keep
9 accurate records, and failing to reimburse necessary business expenses.

10 11. On November 17, 2023, Plaintiffs' counsel propounded written discovery on both
11 Defendants, including Form Interrogatories Employment, Form Interrogatories General, Requests
12 for Production of Documents, and two sets of Special Interrogatories. As the Parties agreed to
13 mediate, they subsequently agreed to conduct informal mediation discovery.

14 12. On March 7, 2024, Lawyers for Justice filed a Notice of Association of Counsel,
15 associating in Domb & Rauchwerger as co-counsel on this matter.

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

18 Executed on March 3, 2026 at Glendale, California.

19 

20 _____
21 Vartan Madoyan
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