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Attorneys for Plaintiff LAVONTRA BREAUX, Individually and on behalf of other members of the general public similarly situated

[Additional Counsel on Following Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

VANESSA HERNANDEZ, LAVONTRA BREAUX, NARON TRIPLETT, and NATALIE FLORES Individually, and on behalf of other members of the general public similarly situated;

Plaintiffs,

vs.

PANDORA JEWELRY LLC, a Maryland Limited Liability Company; PANDORA VENTURES, LLC, a Maryland Limited Liability Company; and DOES 1-10, inclusive,

Defendants.

CASE NO. 24STCV04554

[Related Case Nos.: 23SMCV04825; 24SMCV00844; 24STCV04697; and 24STCV15396]

DECLARATION OF MEHRDAD BOKHOUR ISO PLAINTIFFS' MOTION FOR FINAL APPROVAL

Date: June 5, 2026

Time: 11:30 a.m.

Dept.: 12

Judge: Hon. Carolyn B. Kuhl

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12 on behalf of herself and all others similarly situated

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Attorneys for Plaintiff NARON TRIPLET

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1. I am an attorney at law, duly licensed to practice before all the Courts of the State of California, and I am the principal of Bokhour Law Group, P.C. as attorney of record for Plaintiffs and the Settlement Class.

Class Counsel Are Experienced Class Litigators

4. Before beginning my legal career, I served as a judicial extern for the Honorable Justice Fred Woods of the Second District Court of Appeal, Division Seven. I was also an appellate law clerk at Greines, Martin, Stein & Richland LLP.

6. I have handled approximately 300 employment litigation matters during my 13-year practice. Over the last ten years, my practice has exclusively represented employees, most of which included class action and representative action wage and hour matters. I have been appointed by various courts as class counsel and have received final court approval and judgment in numerous class actions. I anticipate receiving final approval in many more in the future.

DECLARATION OF MEHRDAD BOKHOUR ISO PLAINTIFFS' MOTION FOR FINAL APPROVAL

1 8. I was selected as a “Super Lawyer Rising Star” in Employment Litigation from
2 2017 through 2022 and as a “Super Lawyer” in 2023 through 2025. This distinction is reserved
3 for the top 2.5% of lawyers in the practice area. I have also been recognized by TopVerdicts.com
4 for achieving several of the top wage and hour class and PAGA action settlements in California.

5 9. I am an active member of the California Employment Lawyers Association
6 (“CELA”) and have attended numerous Continuing Legal Education courses on employee
7 advocacy.

8 10. My firm has the experience, resources, and means necessary to allow us to
9 provide adequate representation to all Settlement Class Members in this Action.

10 11. Currently, my firm is acting as co-counsel in at least fifty wage-and-hour class
11 actions.

12 12. Class Counsel are respected members of the California Bar with strong records
13 of vigorous and effective advocacy for their clients, and they are experienced in handling
14 complex class action litigation. Both Class Counsel and Plaintiffs were prepared to litigate the
15 claims in this action, but they strongly and unequivocally support the proposed Settlement as
16 being in the best interest of the Settlement Class based on the circumstances referenced herein.

17 13. In the opinion of Class Counsel, the recovery for each Settlement Class Member
18 is well within the acceptable range for this type of action. This Settlement is also favorable
19 given that the Settlement Class will promptly receive compensation rather than facing
20 uncertainties inherent in further litigation and waiting years for this action to be tried. It is also
21 telling that the Settlement Class has overwhelmingly supported the Settlement on the terms set
22 forth in the Settlement Agreement. Based on all considerations, this Settlement is highly
23 favorable and is in the best interests of the Settlement Class.

24 14. In sum, all relevant factors support final approval of the Settlement. The parties
25 negotiated at arm's length under the supervision of an experienced and well-respected mediator.
26 Class Counsel also investigated, discovered, and analyzed class claims extensively. Moreover,
27 Class Counsel, experienced class action litigators, strongly believe that this Settlement provides
28 an excellent result for the Settlement Class.

