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on behalf of herself and all others similarly situated

[Additional Counsel on Next Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

VANESSA HERNANDEZ, an individual and
on behalf of herself and all others similarly
situated,

Plaintiffs,

v.

PANDORA VENTURES, LLC, a
Maryland limited liability company; and
DOES 1 through 100, inclusive,

Defendants.

CASE NO: 24STCV04554

*[Related to Case No. 24SMCV00844; Case No.
24STCV04697; and Case No. 23SMCV04825]*

[Assigned for all purposes to the Hon. Carolyn
B. Kuhl in Dept. 12]

**DECLARATION OF DAVID D. BIBIYAN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND REPRESENTATIVE
ACTION SETTLEMENT**

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2. Class Counsel at Bibiyan Law Group, P.C., are experienced class action attorneys, have been appointed as class counsel in other class actions, and have successful track records in litigating class actions.

3. I graduated with a Bachelor of Arts degree from the University of California, Los Angeles in 2009.

5. After practicing for several years as a member of Cohen & Lord, P.C., practicing in an amorphous range of civil litigation on behalf of both plaintiffs and defendants, I opened up a law firm in 2014 with a concentration in representation of employees against employers to recover unpaid wages and vindicate harassment, discrimination and retaliation in various contexts.

7. I also created the content for, helped organize, and served as the Moderator for the 2023 California Complex Symposium Wage and Hour/PAGA Section, a Continuing Legal Education seminar and forum featuring four respected Judges serving in the Complex Divisions of their respective county Superior Courts. In addition, my firm served as a sponsor of that event.

8. Not only have I practiced almost exclusively in this field for years and have contributed to the legal education curriculum for attorneys practicing within it, I am also a

published author in the Daily Journal as a contributor in the Wage and Hour and PAGA context, including, in December 15, an article entitled: “PAGA: What’s Gone, What’s Left and What’s Next.” I have also been a quoted source in multiple other publications, including in article published by Bloomberg Law dated November 1, 2023 entitled: “Adidas, Home Depot Sued in Test Cases on Job Ad Pay Transparency.”

9. My firm has the experience, resources, and means necessary to allow us to provide adequate representation as Class Counsel to all class members in this litigation. With approximately 30 attorneys, as well as supporting staff consisting of paralegals and legal assistants, my office has the capacity to represent hundreds of thousands of class members, bring forth efficient resolution of class actions and PAGA actions, engage in complex litigation, file contested motions for class certification, and engage in trial practice.

10. My office has filed contested motions for class certification in the past and have been appointed Class Counsel by the Superior Court of California in the past for purposes of certifying a class for settlement purposes. Some examples of Actions in which I was appointed Class Counsel include:

- *Santoyo v. Consolidated Foundries, Inc.*, Case No. BC612298, California Superior Court, County of Los Angeles, Honorable Judge Ann I. Jones, presiding;

- *Arendorff v. Stanley Steamer International, Inc.*, Case No. BC681368, California Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos, presiding;

- *Barreto v. Don Roberto Jewelers, Inc.*, Case No. BC495451, California Superior Court, County of Los Angeles, Honorable Ann I. Jones, presiding;

- *Junior Amilcar Laguna Gonzalez v. Takaaki Koyama*, Case No. BC641998, Los Angeles Superior Court, Honorable Elihu M. Berle, presiding;

- *Rios v. Nongshim America, Inc.*, Case No. CIVDS1807390, California Superior Court, County of San Bernardino, Honorable David S. Cohn, presiding;

- *Stoddard v. Molded Fiber Glass – West*, Case No. 1517758, California Superior Court, County of San Bernardino, Honorable David S. Cohn, presiding;

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1 • *Mata v. Sahara Scaffold, Inc.*, Case No. CIVDS1810785, California Superior Court,
2 County of San Bernardino, Honorable David S. Cohn, presiding;
3 • *Carrasco v. Pure Dental Solutions*, Case No. BC645995, Los Angeles Superior Court,
4 Honorable Kenneth R. Freeman, presiding;
5 • *Gonzalez v. Gochez, et al.*, Case No. BC648729, Los Angeles Superior Court, Honorable
6 Maren Nelson, presiding;
7 • *Montoya v. Superior Paving Co.*, Case No. CIVDS1833422, County of San Bernardino,
8 Honorable David S. Cohn, presiding;
9 • *Lopez v. Norred & Associates, Inc.*, Case No. CIVDS1824109, California Superior
10 Court, County of San Bernardino, David S. Cohn, presiding;
11 • *Noyola v. Lacren, LLC*, Case No. BC717024, California Superior Court, County of Los
12 Angeles, Hon. Anthony Mohr, presiding;
13 • *Luciano, et al. v. O'Tasty Foods, Inc., et al.*, Case No. BC711988, California Superior
14 Court, County of Los Angeles, Honorable Maren Nelson, presiding;
15 • *Gordon v. Hospice Source, LLC*, Case No. 34-2018-00250022-CU-OE-GDS, California
16 Superior Court, County of Sacramento, Honorable Christopher E. Krueger, presiding;
17 • *Barragan v. Refrigeration Supplies Distributor*, Case No. 19STCV09312, California
18 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;
19 • *Ramirez v. Acre Gourmet, Inc.*, Case No. CGC-19-575117, California Superior Court,
20 County of San Francisco, Honorable Andrew Y.S. Cheng, presiding;
21 • *Villafuerte v. Bay Alarm Company*, Case No. BC689110, California Superior Court,
22 County of Los Angeles, Honorable Amy D. Hogue, presiding;
23 • *Cazares v. Areas USA LAX, LLC*, Case No. 19STCV08209, California Superior Court,
24 County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;
25 • *Magana v. Castlerock Environmental, Inc., et al.*, Case No. 19STCV38353, California
26 Superior Court, County of Los Angeles, Honorable Ann I. Jones, presiding;
27 • *Chilel v. Sushi California, Inc.*, Case No. 19STCV08209, California Superior Court,
28 County of Los Angeles, Honorable Ann I. Jones, presiding;

1 • *Malone v. Orange Courier, Inc., et al.*, Case No. 30-2016-00763474, California Superior
2 Court, County of Orange, Honorable Glenda Sanders, presiding;
3 • *Rivera v. Talamo Food Services, Inc.*, Case No. 19CV355856, California Superior Court,
4 County of Santa Clara, Honorable Patricia M. Lucas, presiding;
5 • *Olguin v. Cal Central Harvesting, Inc.*, Case No. 18CV03860, California Superior Court,
6 County of Santa Barbara, Honorable James F. Rigali, presiding;
7 • *Pence v. Sober Living by the Sea, Inc.*, Case No. 2018-00988742, California Superior
8 Court, County of Orange, Honorable Randall J. Sherman, presiding;
9 • *Franco v. Vincent Rags, Inc.*, Case No. 20STCV07768, California Superior Court,
10 County of Los Angeles, Honorable Ann I. Jones, presiding;
11 • *Cabral v. Miller Castings, Inc.*, Case No. 19STCV39556, California Superior Court,
12 County of Los Angeles, Honorable Carolyn B. Kuhl, presiding;
13 • *Bolanos v. Texas Roadhouse, Inc.*, Case No. 19STCV39556, California Superior Court,
14 County of Los Angeles, Honorable Sunshine Sykes, presiding;
15 • *Rodriguez v. Scott A. Humphreys, Inc.*, Case No. 30-2021-01184556-CU-OE-CXC,
16 California Superior Court, County of Ventura, Honorable Matthew P. Guasco, presiding; and
17 • *Torres v. Primal Pet Foods, Inc.* Case No. FCS054783, California Superior Court,
18 County of Solano, Honorable Wendy G. Getty, presiding;
19 • *Hanson v. Zapata Nuccio, Inc.*, Case No. 20STCV28951, California Superior Court,
20 County of Los Angeles, Honorable Elihu M. Berle, presiding;
21 • *Molina v. Avibank Mfg, Inc.*, Case No. 20STCV03910, California Superior Court,
22 County of Los Angeles, Honorable John P. Doyle, presiding;
23 • *Cetina v. Lawry's Restaurants, Inc.*, Case No. 19STCV05201, California Superior Court,
24 County of Los Angeles, Honorable Amy D. Hogue, presiding;
25 • *Luna v. Pronto California General Agency, LLC*, Case No. 19STCV39951, California
26 Superior Court, County of Los Angeles, Honorable Elihu M. Berle, presiding;
27 • *Alvarez v. Kazak-Mars, Inc.*, Case No. 20STCV42587, California Superior Court,
28 County of Los Angeles, Honorable Elihu M. Berle, presiding;

1 • *Noe v. My Pillow, Inc.* Case No. CIVDS 2011360, California Superior Court, County of
2 San Bernardino, Honorable David Cohn, presiding;

3 • *Nunez v. 2751 West Coast Acquisition Company*, Case No. 30-2020-01145215-CU-
4 OE-CXC, California Superior Court, County, County of Orange, Honorable Randall J. Sherman,
5 Presiding;

6 • *Smith v. McMillen Enterprises, Inc.*, Case No. CV-20-002938, California Superior Court,
7 County of Stanislaus, Honorable John R. Mayne, presiding;

8 • *Turner v. Plant Prefab Inc., et al.*, Case No. CIVDS2017517, California Superior Court,
9 County of San Bernardino, Honorable David Cohn, presiding;

10 • *Duran v. Fresh Select, LLC*, Case No. VCU284892, California Superior Court, County
11 of Tulare, Honorable Bret Hillman, presiding;

12 • *Reynoso, et al. v. Cream of the Crop AG Service, Inc.*, Case No. VCU278847, California
13 Superior Court, County of Tulare, Honorable Bret Hillman, presiding;

14 • *Michel v. Universal Waste Systems, Inc.*, Case No. 19STCV46181, California Superior
15 Court, County of Los Angeles, Honorable David S. Cunningham presiding;

16 • *Jungers v. U.S. Borax Inc., et al.*, Case No. BCV-21-10003, California Superior Court,
17 County of Kern, Honorable Bernard C. Barmann Jr. presiding;

18 • *Fortune v. Amoroso Limited Partnership, et al.*, Case No. 20STCV25874, California
19 Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;

20 • *Montoya, et al. v. Remo, Inc.* Case No. 20STCV34614, California Superior Court,
21 County of Los Angeles, Honorable Maren Nelson presiding;

22 • *Rincon, et al. v. New-Indy Tripaq, LLC, et al.* Case No. 20STCV17118, California
23 Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;

24 • *De Leon, et al. v. Wismettac Asian Foods, Inc.* Case No. 19STCV18172, California
25 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;

26 • *Tapia v. Mercer Foods, Inc.* Case No. CV-21-000020, California Superior Court,
27 County of Stanislaus, Honorable Sonny S. Sandhu presiding;

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1 • *Molina v. Reser's Fine Foods, Inc.* Case No. 37-2021-00013052-CU-OECTL, California
2 Superior Court, County of San Diego, Honorable Eddie C. Sturgeon presiding;

3 • *Reyes v. Imperial Sprinkler Supply, Inc.* Case No. 30-2020-01167748-CU-OE-CXC,
4 California Superior Court, County of Los Angeles, Honorable Peter Wilson presiding;

5 • *Zavala, et al. v. PLS Check Cashers, Inc.* Case No. 20STCV42586, California Superior
6 Court, County of Los Angeles, Honorable Elihu M. Berle presiding;

7 • *Paz v. Hill Brothers Chemical Company.* Case No. 20STCV48279, California Superior
8 Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;

9 • *Garcia v. Inwesco Incorporated.* Case No. 20STCV46833, California Superior Court,
10 County of Los Angeles, Honorable Carolyn B. Kuhl presiding;

11 • *Guevara v. J&K Culver, LLC, et al.* Case No. 19STCV39951, California Superior Court,
12 County of Los Angeles, Honorable Elihu M. Berle presiding;

13 • *Hamilton v. Michael Kors Stores, Inc. et al.,* Case No. 19STCV37061, California
14 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;

15 • *Arzooian v. A&M Administration, LLC, et al.* Case No. 21STCV05576, California
16 Superior Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;

17 • *Santos, et al. v. Maruzen of America, Inc.,* Case No. 19STCV37662, California Superior
18 Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;

19 • *Schaffino v. M.O. Dion & Sons., Inc., et al.,* Case No. 20STCV38023, California Superior
20 Court, County of Los Angeles, Honorable Gail Killefer presiding;

21 • *Moreno v. Santa Paula Post Acute, LLC, et al.* Case No. 21STCV12533, California
22 Superior Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;

23 • *Singer v. Desert Area Resources and Training,* Case No. BCV-21-101093, California
24 Superior Court, County of Kern, Honorable Thomas S. Clark presiding;

25 • *Clarizio v. Guard-Systems, Inc.,* Case No. 21STCV28667, California Superior Court,
26 County of Los Angeles, Honorable Armen Tamzarian presiding;

27 • *Guzman v. Freschco Painters, Inc.,* Case No. 21STCV04683, California Superior Court,
28 County of Los Angeles, Honorable Lawrence P. Riff presiding;

1 • *Koutny v. PAE Aviation and Technical Services, LLC*, Case No. 21C-0106, California
2 Superior Court, County of Kings, Honorable Melissa R. D’Morias presiding;
3 • *Rodriguez v. Pacifica Trucks, LLC*, Case No. 20STCV37576, California Superior Court,
4 County of Los Angeles, Honorable Stuart Rice presiding;
5 • *Ramos v. AEGIS Treatment Centers, LLC*, Case No. 20STCV41429, California Superior
6 Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
7 • *Valdez v. Integrated Building Services, Inc.* Case No. 20STCV37793, California Superior
8 Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
9 • *Harris v. America One Security, Inc.* Case No. 21STCV01399, California Superior
10 Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
11 • *Moreno v. M&J Seafood Company, Inc.* Case No. 22STCV03341, California Superior
12 Court, County of Los Angeles, Honorable William F. Highberger presiding;
13 • *Corrales v. Q&B Foods, Inc.* Case No. 20STCV40885, California Superior Court,
14 County of Los Angeles, Honorable Elihu Berle presiding;
15 • *Arteaga v. Demolition Specialist, Inc.* Case No. RIC2001133, California Superior Court,
16 County of Riverside, Honorable Harold Hopp presiding;
17 • *Vigil, et al. v. Capstone Turbine Corporation*, Case No. 20STCV32123, California
18 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
19 • *Ramirez v. Sea-Win, Inc.* Case No. 21STCV22026, California Superior Court, County
20 of Los Angeles, Honorable Lawrence P. Riff presiding;
21 • *Ortega Chavez v. Winkpak Lane, Inc.* Case No. CIVSB2207313, California Superior
22 Court, County of San Bernardino, Honorable Jessica Morgan presiding;
23 • *Garcia v. American Licorice Company.* Case No. RG21107049, California Superior
24 Court, County of Alameda, Honorable Brad Seligman presiding;
25 • *Madrono v. Vitale Nursing, Inc, et al.*, Case No. 21STCV09845, California Superior
26 Court, County of Los Angeles, Honorable Lawrence P. Riff presiding; and
27 • *Orellana v. Advanced Building Maintenance.* Case No. 34-2020-00286791-CU-OE-
28 GDS, California Superior Court, County of Sacramento, Honorable Jill Talley presiding.

1 • *Aguilar v. Bioness, Inc., et al.*, Case No. 21STCV41702, California Superior Court,
2 County of Los Angeles, Honorable Lawrence P. Riff presiding;
3 • *Antoine v. Pinky Beverly Hills, LLC., et al.* Case No. 19STCV44856, California
4 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
5 • *Phambui v. Fashion Marketing and Merchandising Group, Inc., et al.* Case No.
6 21STCV06634, Superior Court, County of Los Angeles, Honorable Stuart M. Rice presiding;
7 • *Ortega Chavez v. Winpak Lane, Inc., et al.* Case No. CIVSB2202274, California
8 Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;
9 • *Carrasco v O.H. Barkhordar D.D.S., Inc., et al.* Case No. 22STCV21188, California
10 Superior Court, County of Los Angeles, Honorable Lawrence Riff presiding;
11 • *Correia v. Gallo Glass Company, et al.* Case No. CV-21-006459, California Superior
12 Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;
13 • *Davis v. Beeline Import and Services, LLC, et al.* Case No. CIVSB2119287, California
14 Superior Court, County of San Bernardino, Honorable David Cohn presiding;
15 • *Angel Lopez v Innovative Coatings Technology Corporation dba Incotec, et al.* Case No.
16 30-2020-01173245-CU-OE-CXC, California Superior Court, County of Orange, Honorable Lon
17 Hurwitz presiding;
18 • *Lopez v UPM, Inc., et al.* Case No. 20STCV36695, California Superior Court, County of
19 Los Angeles, Honorable Lawrence P. Riff presiding;
20 • *Moreno v. Infiniti Group LLC., et al.* Case No. CIVSB2223551, California Superior
21 Court, County of San Bernardino, Honorable Joseph T. Ortiz presiding;
22 • *Kelley v. Applus Technologies, Inc., et al.* Case No. CIVSB2204889, California Superior
23 Court, County of San Bernardino, honorable Jessica Morgan presiding;
24 • *Hernandez v Bromley Foods, Inc., et al.* Case No. 56-2021-00561326-CU-OE-VTA,
25 California Superior Court, County of Ventura, Honorable Henr Walsh presiding;
26 • *Heredia v. Alan Smith Pool Plastering, Inc., et al.* Case No. 30-2020-01163609-CU-OE-
27 CXC, California Superior Court, County of Orange, Honorable Randall J. Sherman presiding;
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1 • *Martinez Guzman v Freshco Painters Inc., et al. Case No. 21STCV04683*, California
2 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
3 • *Gomez Mireles v. USG Ceilings Plus, LLC., et al. Case No. 21STCV45606*, California
4 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
5 • *Garzon v. Mobile Hi-Tech Wheels, LLC., et al., Case No. 21STCV15396*, California
6 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
7 • *Dethrasavong v. ASI Computer Technologies, Inc., et al. Case No. 20STCV32312*,
8 California Superior Court, County of Contra Costa, Honorable Kenneth R. Freeman presiding;
9 • *Lopez v. Waldorf Astoria Management LLC., et al. Case No. 20STCV17212*, California
10 Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;
11 • *Viveros v. Mission Produce, Inc., et al. Case No. 20STCV15737*, California Superior
12 Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;
13 • *Flores v. United Maintenance Company, Inc., et al. Case No. 21STCV07008*, California
14 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
15 • *Blandi v. Francesca Restaurant, LLC., et al. Case No. 37-2022-00049034-CU-OE-CTL*,
16 California Superior Court, County of San Diego, Honorable Marcella O. McLaughling presiding;
17 • *Lopez Cabrera v. South Valley Almond Company, LLC, et al. Case No. BCV-2-100722*,
18 California Superior Court, County of Kern, Honorable Bernard C. Barmann, Jr. presiding;
19 • Guillermo Cruz v. Alma Family Serives, et al. Case No. 21STCV18156, California
20 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
21 • *Davood v. NKSFB, LLC, et al. Case No. 22STCV17305*, California Superior Court,
22 County of Los Angeles, Honorable Christopher K. Lui presiding;
23 • *Ferrer v. Ineos USA, LLC., et al., Case No. 21STCV28076*, California Superior Court,
24 County of Los Angeles, Honorable Elihu M. Berle presiding;
25 • *Portillo Sanchez v. Paragon Services Janitorial Orange County, LLC, et al. Case No.*
26 *20STCV38562*, California Superior Court, County of Los Angeles, Honorable William F.
27 Highberger presiding;
28 //

1 • *Trigueros Garcia v. Highland Plastics, Inc., et al.*, Case No. CVRI2202836, California
2 Superior Court, County of Riverside, Honorable Harold Hopp presiding;

3 • *Magana Ramirez v. 360 Support Services, et al.* Case No. 22STCV20456, California
4 Superior Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;

5 • *Morales v. Baldy's Restaurant Group, LLC., et al.* Case No. 20STCV36535, California
6 Superior Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;

7 • *Gonzales v. El Monte Rents, Inc., et al.* Case No. 21STCV10209, California Superior
8 Court, County of Los Angeles, Honorable Stuart M. Rice presiding;

9 • *Gonzalez v. Total Education Solutions, Inc., et al.* Case No. 20STCV37984, California
10 Superior Court, County of Los Angeles, Honorable Maren Nelson presiding;

11 • *Helaire v. Smithfield Packaged Meats Corp, et al.* Case No. JCCP5244, California
12 Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;*Hernandez v.*
13 *Central Valley Recovery Services, et al.* Case No. VCU290220, California Superior Court, County
14 of Tulare, Honorable Brett Hillman presiding;

15 • *Hernandez v. SC Commercial, LLC, et al.* Case No. 30-2020-01166961-CU-OE-CXC,
16 California Superior Court, County of Orange, Honorable Lon Hurwitz presiding;

17 • *Hines v. Constellis Integrated Risk Management Services, et al.* Case No.
18 20STCV26962, California Superior Court, County of Los Angeles, Honorable Christopher K. Lui
19 presiding;

20 • *Moya v. Valassis Direct Mail, Inc., et al.* Case No. 21STCV09412, California Superior
21 Court, County of Los Angeles, Honorable Stuart Rice presiding;

22 • *Jordan v. The Martin-Brower Company, LLC, et al.*, Case No. 21STCV41435, California
23 Superior Court, County of Los Angeles, honorable Stuart Rice presiding;

24 • *Juarez v. Calmet Services, Inc., et al.* Case No. 21STCV33668, California Superior
25 Court, County of Los Angeles, Honorable Kenneth R. Freeman presiding;

26 • *Mcintosh v. WWL Vehicle Services Americas Inc., et al.* Case No. 56-2022-00562544-
27 CU-OE-VTA, California Superior Court, County of Ventura, Honorable Benjamin Coats
28 presiding;

- 1 • *Mendoza v. Amusement Industry, Inc., et al.* Case No. 21STCV09790, California
2 Superior Court, County of Los Angeles, Honorable Carolyn B. Kuhl presiding;
- 3 • *Moore v. Dnata US Inflight Catering LLC, et al.* Case No. CGC-20-586512, California
4 Superior Court, County of San Francisco, Honorable Curtis Karnow presiding;
- 5 • *Peterson v. Sorenson Engineering, Inc., et al.* Case No. CIVDS2023994, California
6 Superior Court, County of San Bernardino, Honorable David Cohn presiding;
- 7 • *Torres v. Laurel Avenue, LLC, et al.* Case No. CIVSB2202708, California Superior
8 Court, County of San Bernardino, Honorable David Cohn presiding;
- 9 • *Nunley v. Cardinal Logistics Management Corporation et al.* Case No. CIVSB2210430,
10 California Superior Court, County of San Bernardino, Honorable Joseph T. Ortiz presiding;
- 11 • *Pastrana v. National Sign & Marketing Corporation et al.* Case No. CIVSB2118749,
12 California Superior Court, County of San Bernardino, Honorable David Cohn presiding;
- 13 • *Pineda v. Grand Life, Inc., et al.* Case No. 21STCV28066, California Superior Court,
14 County of Los Angeles, Honorable Elihu M. Berle presiding;
- 15 • *Pattingale v. Laird Family Estate, LLC et al.* Case No. 22CV000048, California Superior
16 Court, County of Napa, Honorable Cynthia P. Smith presiding;
- 17 • *Ramirez v. Sea Win, Inc., et al.* Case No. 21STCV22026, California Superior Court,
18 County of Los Angeles, Honorable Lawrence P. Riff presiding;
- 19 • *Reategui v. Cal Building & Maintenance Industries, Inc.,* Case No. 20STCV39648,
20 California Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;
- 21 • *Rodriguez v. ACRA Aerospace, LLC, et al.* Case No. 30-2020-01171360-CU-OE-CXC,
22 California Superior Court, County of Orange, Honorable Randall J. Sherman presiding;
- 23 • *Rodriguez v. Ultra Pro International LLC, et al.* Case No. 21STCV11250, California
24 Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding;
- 25 • *Ruiz v. Kleen Harvest, Inc., et al.* Case No. 21CV002319, California Superior Court,
26 County of Monterey, Honorable Thomas W. Wills presiding;
- 27 • *Roberto Ruiz v. Protech Delivery and Installation et al.* Case No. 21STCV07001,
28 California Superior Court, County of Los Angeles, Honorable Stuart M. Rice presiding;

1 • *Russell v. CIMC Reefer Trailer, Inc., et al.* Case No. RIC2001777, California Superior
2 Court, County of Riverside, Honorable Harld Hopp presiding;
3 • *Russell v. Staffmark Investment LLC, et al.* Case No. CVRI12103921, California
4 Superior Court, County of Riverside, Honorable Harold Hopp presiding;
5 • *Quintanilla et al. v. Chrome Hearts LLC, et al.* Case No. 21STCV43180, California
6 Superior Court, County of Los Angeles, Honorable Elihu B. Berle presiding;
7 • *Taat v. Acell, Inc., et al.* Case No. 37-2022-00005437-CU-OE-CTL, California Superior
8 Court, County of San Diego, Honorable Matthew C. Braner presiding;
9 • *Todd v. Motivate, LLC, et al.* Case No. CGC-23-605052, California Superior Court,
10 County of San Francisco, Honorable Anne- Christine Massullo presiding;
11 • *Turner Sr., v. The Sidewalk Café, Inc., et al.* Case No. 21STCV10154, California
12 Superior Court, County of Los Angeles, Honorable William F. Highberger presiding;
13 • *Vargas-Flores v. Harbor Bay Club, Inc., et al.* Case No. 21CV002396, California
14 Superior Court, County of Alameda, Honorable Michael Markman presiding;
15 • *Vasquez v. Liquid Technologies, Inc., et al.* Case No. CIVDS2023892, California
16 Superior Court, County of San Bernardino, Honorable Joseph Ortiz presiding;
17 • *Vasquez et al. v. Kingswood LLC, et al.,* Case No. 20STCV32123, California Superior
18 Court, County of Los Angeles, Honorable Lawrence P. Riff presiding;
19 • *Sandoval Villafana v. Satco, Inc., et al.* Case No. 21STCV17085, California Superior
20 Court, County of Los Angeles, Honorable Yvette M. Palazuelos presiding;
21 • *Williams v. Marrs Services, Inc., et al.* Case No. 21STCV23775, California Superior
22 Court, County of Los Angeles, Honorable Stuart M. Stuart presiding;
23 • *Low v. Triple Canopy, Inc., et al.* Case No. 37-2023-0007078-CU-OE-CTL, California
24 Superior Court, County of San Diego, Honorable Carolyn Caietti presiding;
25 • *Camacho v. Premium Electric Corp, et al.* Case No. 22STCV26878, California Superior
26 Court, County of Los Angeles, Honorable David S. Cunningham presiding;
27 • *Lopez v. Bachem Americas, Inc., et al.* Case No. 23STCV04258, California Superior
28 Court, County of Los Angeles, Honorable Laura Seigle presiding;

1 • *Mendoza Cendejas v. E. & J. Gallo Winery, et al.* Case No. CV-22-005396, California
2 Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;
3 • *Romero v. Armstrong Installation Service, et al.* Case No. 22CV022519, California
4 Superior Court, County of Alameda, Honorable Noel Wise presiding;
5 • *Perez v. D&G Restaurants, LLC, et al.* Case No. 30-2021-01209638-CU-OE-CXC,
6 California Superior Court, County of Orange, Honorable Peter Wilson presiding;
7 • *Sarmiento, et al. v. Neil Jones Food Company* Case No. 21CECG03825, California
8 Superior Court, County of Fresno, Hon. Kristi Culver Kapetan presiding; and
9 • *Garcia v. Nature Fresh Farms, LLC, et al.* Case No. ECU001961, California Superior
10 Court, County of Imperial, Honorable Jeffery B. Jones presiding.

11 11. I have also settled matters on a “PAGA Only” basis for aggrieved employees in the
12 past, including in:

13 • *Flores v. Delta Apparel, Inc.*, Case No. BC641499, California Superior Court, County
14 of Los Angeles, Honorable Daniel J. Buckley, presiding;
15 • *Segura v. CJ Foods Service Holdings USA, LLC*, Case No. 19STCV24918, California
16 Superior Court, County of Los Angeles, Honorable Maureen Duffy-Lewis, presiding;
17 • *Sierra v. Nexem-Allied, LLC*, Case No. 20STCV11281, California Superior Court,
18 County of Los Angeles, Honorable Randolph M. Hammock, presiding;
19 • *Nodal v. Sodexo, Inc.*, Case No. 20STCV40601, California Superior Court, County of
20 Los Angeles, Honorable Lawrence Riff, presiding; and
21 • *Cooper v. Lucas Health Partners*, Case No. 20STCV20050, California Superior Court,
22 County of Los Angeles, Honorable Maren Nelson, presiding;
23 • *Herrera v. Greystar Management, LP, et al.*, Case No. 37-2020-00009672-CU-OE-CTL,
24 California Superior Court, County of San Diego, Honorable Carolyn Caietti, presiding;
25 • *Slater v. Jo-Ann Stores, LLC.*, Case No. 21STCV18454, California Superior Court,
26 County of Los Angeles, Honorable Maurice A. Leiter, presiding;
27 • *Bolanos v. Canoga Park Heating & Air Conditioning, Co., Inc.*, Case No. 21STCV12674,
28 California Superior Court, County of Los Angeles, Honorable Yolanda Orozco, presiding;

1 • *Granados v. Cosmetic Ideas, Inc.* Case No. 21STCV10797, California Superior Court,
2 County of Los Angeles, Honorable Richard L. Fruin, presiding;
3 • *Ruano v. DPC Woodwork, Inc.* Case No. 21STCV00408, California Superior Court,
4 County of Los Angeles, Honorable Jon R. Takasugi presiding;
5 • *Hardy v. Texas Roadhouse Management Corp., et al.* Case No. CIVSB2222259,
6 California Superior Court, County of San Bernardino, Honorable Jessica Morgan presiding;
7 • *Iraheta v Legacy Farmers, Inc., et al.* Case No. MSC21-00762, California Superior
8 Court, County of Los Angeles, Honorable Charles S. Treat presiding;
9 • *Landin v Central Janitors' Supply Co., Inc., et al.* Case No. CV-21-006391, California
10 Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;
11 • *Bailey v. Cannon Constructors, et al.* Case No. 21STCV38274, California Superior
12 Court, County of Los Angeles, Honorable Carolyn Kuhl presiding;
13 • *Johns, et al. v. Whelan Security of California, Inc., et al.* Case No. 22STCV68687,
14 California Superior Court, County of Los Angeles, Honorable Laura Seigle presiding;
15 • *Carrion v. Clutter, Inc., et al.* Case No. 23STCV06709, California Superior Court,
16 County of Los Angeles, Honorable Kerry Bensinger presiding;
17 • *Delia v. The Irvine Company, LLC, et al.* Case No. 30-2019-01050823-CU-OE-CXC,
18 California Superior Court, County of Orange, Honorable William D. Claster presiding;
19 • *Landin v. Central Janitor's Supply Co., Inc., et al.* Case No. CV-21-006391, California
20 Superior Court, County of Stanislaus, Honorable Sonny S. Sandhu presiding;
21 • *German Vaca et al., v. California Pizza Kitchen, Inc., et al.* Case No. 30-2022-01278828-
22 CU-OE-CXC, California Superior Court, County of Orange, Honorable Randall Sherman
23 presiding;
24 • *London Young v. Amazon.com LLC, et al.* Case No. 21STCV38280, California Superior
25 Court, County of Los Angeles, Honorable Elaine Lu presiding;
26 • *Martinez v. Dick's Sporting Goods, Inc., et al.* Case No. 22STCV17283, California
27 Superior Court, County of Los Angeles, Honorable Armen Tamzarian presiding;
28 ///

1 • *Latrice Ackles v. Brinker Restaurant Corporation, et al.* Case No. 22STCV19068,
2 California Superior Court, County of Los Angeles, Honorable Gail Killefer presiding; and

3 • *Ruiz v. Edelbrock Foundry, LLC, et al.* Case No. 20STCV19057, California Superior
4 Court, County of Los Angeles, Honorable David S. Cunningham presiding.

5 12. Furthermore, my office has succeeded in certifying classes in contested motions
6 for class certification. Some of the classes and theories we have certified include, without
7 limitation, for failure to pay the regular rate of pay; failing to pay overtime and minimum wages,
8 including, without limitation, for temperature checks; failure to provide meal and rest premiums,
9 including, without limitation, for requiring employees to walk during breaks; failure to timely pay
10 wages prior to separation of employment; wage statement violations; and unfair competition.
11 Some examples of matters in which we have done so include, without limitation:

12 • *Hernandez, et al. v. C.R. Lawrence Co., Inc.*, Case No. 20STCV32372, California
13 Superior Court, County of Los Angeles, Hon. William Highberger presiding;

14 • *Lopez v. Rolling Hills Country Club*, Case No. 21STCV22636, California Superior
15 Court, County of Los Angeles; Hon. Carolyn B. Kuhl presiding; and

16 • *Torres v. Johnston Nurseries, FLP*, Case No. BCV-19-100830 TSC, California Superior
17 Court, County of Kern; Hon. Thomas S. Clark, presiding.

18 13. I believe that I am sufficiently experienced and qualified to evaluate the Class
19 Members' claims and viability of Defendant's defenses.

20 14. Vedang J. Patel has been a member of my law firm for over four (4) years and
21 served as class counsel on numerous actions on which I was also named class counsel. Prior to
22 working with Bibiyan Law Group, P.C., he practiced law with Murchison & Cumming, LLP on a
23 variety of matter on behalf of defendants. Thereafter, he joined Bibiyan Law Group, P.C.,
24 practicing law on behalf of plaintiffs in matters of employment law, and specifically on issue of
25 unpaid wages and class action settlements. He is currently a Partner at Bibiyan Law Group, P.C.,
26 and head of the Settlement Department. Among other tasks, he oversees and manages all
27 settlements at Bibiyan Law Group, P.C. He also oversees several attorneys, paralegals, and legal
28

1 assistants and has overseen the settlement of over one hundred (100) class and PAGA matters
2 while with our office.

3 15. I believe recovery for each Class Member is well within the acceptable range for
4 this type of action. Class Counsel and the plaintiffs were prepared to litigate the claims in this
5 Action, but they strongly and unequivocally support the proposed Settlement as being in the best
6 interest of the Settlement Class based on the circumstances referenced herein. I believe that this
7 Settlement is favorable given that the Settlement Class will receive compensation promptly rather
8 than facing uncertainties inherent in further litigation and waiting years for this Action to be tried.
9 Furthermore, I believe the Settlement Class has, overwhelmingly supported the Settlement on the
10 terms set forth in the Settlement Agreement, as evidenced by the participation rate by the
11 Settlement Class. Thus, this Settlement is highly favorable and is in the best interests of the
12 Settlement Class.

13 **An Award of Attorneys' Fees as Requested is Appropriate Under the Lodestar Method**

14 16. I believe Class Counsel earned the requested fee, as this case was vigorously
15 litigated. Over 233 hours will have been expended by Bibiyan Law Group, P.C.'s attorneys and
16 staff to date.

17 17. To summarize Class Counsel's lodestar request Class Counsel will have collectively
18 worked approximately 233.2 hours. Class Counsel's hourly rate in this case for David D. Bibiyan is
19 \$1,100 per hour (approx. 33.2 hours); Vedang J. Patel is \$800 per hour (approx. 14.2 hours); Zach
20 Chrzan is \$700 per hour (approx. 44.5 hours); Brandon M. Chang is \$650 per hour (approx. 22.7
21 hours); Adam Lonner is \$600 per hour (approx. 6.8 hours); Rafael Yedoyan is \$550 per hour
22 (approx. 91.3 hours); Paralegals are \$200 per hour (approx. 11.3 hours); and Legal Assistants are
23 \$95 per hour (approx. 9.2 hours). At Bibiyan Law Group's hourly rates, this results in a total lodestar
24 amount of \$151,214.

25 **Class Counsel's Hours Spent on the Case**

26 18. Bibiyan Law Group, P.C., has already spent over 233 hours litigating this case to date
27 and bringing it to fruition. The hours spent in connection with this action included:

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- The investigation of the matter, including meeting with Plaintiff Hernandez, reviewing policies provided by Plaintiff Hernandez, review of documents in Plaintiff Hernandez's possession, review and analysis of Plaintiff Hernandez's personnel files, and exploring Defendant's corporate structure to determine whether any other individuals or entities should be named in the litigation;
- Researching the dockets for other cases filed against the defendants, determining whether they named all allegedly culpable defendants and included all theories available;
- Compliance with prerequisites in connection with Plaintiff Hernandez's cause of action under PAGA;
- Filing and serving of the Hernandez PAGA Notice;
- Drafting, filing, and serving pleadings in the Action, including the wage and hour Class Action complaint, and a First Amended Complaint in the Class Action to consolidate the actions for purposes of settlement approval;
- Review and analysis of Defendants' Answers;
- Review and analysis of the Court's Minute Orders, attention to scheduling and delegation of actions in light thereof, meeting and conferring with Defendants' counsel, drafting and filing of Joint Reports, Joint Case Management Statements, Joint Stipulations, and preparation for appearance at conferences and hearings;
- Discussing the potential merits of mediation, as well as negotiating the parameters thereof and the informal discovery to be exchanged beforehand, which involved iterations of written correspondence back and forth and several telephone discussions between counsel regarding the potential scope of releasees, discovery, as well as the scope of the pleadings;
- Extensive correspondence with co-counsel regarding the parameters of joint representation;
- Selecting a mediator and scheduling the mediation date;

///

- Negotiating and drafting a potential pre-mediation joint stipulation which included an agreement by Defendants to refrain from attempting to individually settle employees' claims alleged in the Actions;
- Obtaining and reviewing informal discovery from Defendants, including time and payroll records putative class data points for Class Members for putative class members, Defendants' written policies, and other informal discovery produced, and analyzing the same with the aid of co-counsel, retained expert data consultants, and Plaintiff Hernandez to perform analyses of liability and exposure;
- Various direct conversations between counsel to exchange information in advance of mediation, ensuring that all Parties were apprised of the claims and defenses to ensure a meaningful mediation date;
- Preparation of a mediation brief and a damages model in conjunction with expert consultants, both for use at the mediation session;
- Attendance at the mediation session by various attorneys;
- Extensive negotiation, with the assistance of a mediator, regarding the terms of the settlement, which was memorialized in a long form Settlement Agreement;
- Exchange of numerous versions of the long form Settlement Agreement, and finalizing and fully executing the long form Settlement Agreement;
- Reviewing the Class Notice;
- Communicating with Plaintiff who requested updates or other information regarding this matter;
- Preparing the Motion for Preliminary Approval;
- Working with co-counsel to revise the Class Notice and file supplemental briefing and declarations in support of Plaintiffs' Motion for Preliminary Approval of the Settlement to address the Court's concerns;
- Working with opposing counsel, co-counsel, and the Settlement Administrator to ensure timely administration of the Class Notice to Class Members;

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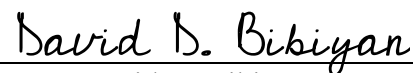
- Working with opposing counsel, co-counsel, and the Settlement Administrator to address Class Members' Objections to the Settlement;
- Reviewing and analyzing the Settlement Administrator's final report to provide the information necessary for the Court's review of the Motion for Final Approval; and
- Preparing the instant Motion for Final Approval.

19. And the over 233 hours expended by the lawyers and staff members of Bibiyan Law Group, P.C., in connection with this Action is only a calculation of efforts made thus far; it does not include the time that will be spent preparing for and attending the final approval hearing and updating this Court regarding the disposition of uncashed checks and/or amending the judgment, if necessary. Thus, Class Counsel request that the Court find that these hours are reasonable in this litigation.

Costs Incurred by Class Counsel

20. The itemized costs incurred by Bibiyan Law Group, P.C., in the above-referenced matter total \$8,863.59, as more fully detailed in the Bibiyan Law Group, P.C. List of Expenses attached hereto as Exhibit 1.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct this May 11, 2026, at Los Angeles, California.



David D. Bibiyan

EXHIBIT 1

List of Expenses Items 2024.03.28 - 5/11/2026



David D. Bibiyan
Attorney at Law
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 Los Angeles, California 90024
 310.438.5555 T
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 david@tomorrowlaw.com
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May 11, 2026

DATE	TYPE	PAYABLE TO	TOTAL AMOUNT
1/22/2026	E-Filing/E-Service	Steno Agency, Inc.	\$ 121.95
10/31/2025	E-Filing/E-Service	Steno Agency, Inc.	\$ 54.95
12/1/2025	E-Filing/E-Service	Case Anywhere LLC	\$ 49.00
11/3/2025	E-Filing/E-Service	Case Anywhere LLC	\$ 49.00
10/1/2025	E-Filing/E-Service	Case Anywhere LLC	\$ 49.00
9/2/2025	E-Filing/E-Service	Case Anywhere LLC	\$ 49.00
8/4/2025	E-Filing/E-Service	Case Anywhere LLC	\$ 49.00
9/3/2025	E-Filing/E-Service	Steno Agency, Inc.	\$ 54.95
8/28/2025	Case Document Purchase	LOS ANGELES COUNTY SUPERIOR COURT	\$ 2.00
7/1/2025	E-Service	Case Anywhere LLC	\$ 49.00
6/2/2025	E-Service	Case Anywhere LLC	\$ 49.00
6/24/2025	E-Filing/E-Service	Steno Agency, Inc.	\$ 54.95
3/5/2025	E-Service	Case Anywhere LLC	\$ 147.00
5/2/2025	Case Document Purchase	Los Angeles Superior Court	\$ 4.00
4/4/2025	E-Service	Case Anywhere LLC	\$ 49.00
3/12/2025	E-Filing/E-Service	Steno Agency, Inc.	\$ 642.20
4/3/2025	Analysis	Berger Consulting Group, LLC	\$ 1,850.34
12/5/2024	E-Service	Case Anywhere LLC	\$ 147.00
11/4/2024	Mediation	Serratore Law, APC	\$ 3,500.00
9/4/2024	E-Service	Case Anywhere LLC	\$ 138.30
6/14/2024	E-Filing	All-N-One Legal Support	\$ 13.70
3/28/2024	E-Service	All-N-One Legal Support	\$ 66.50
3/8/2024	E-Service	All-N-One Legal Support	\$ 66.50
4/24/2024	Case Document Purchase	LOS ANGELES COUNTY SUPERIOR COURT	\$ 4.00
4/3/2024	E-Filing	All-N-One Legal Support	\$ 13.70
3/29/2024	E-Filing	All-N-One Legal Support	\$ 13.70
3/28/2024	Postage	United States Postal Service	\$ 2.83
3/15/2024	E-Filing	All-N-One Legal Support	\$ 13.70
3/14/2024	Postage	United States Postal Service	\$ 0.64
2/27/2024	LWDA fee	LWDA	\$ 75.00
2/26/2024	E-Filing	All-N-One Legal Support	\$ 1,448.70
2/23/2024	Postage	United States Postal Service	\$ 8.69
2/20/2024	Postage	United States Postal Service	\$ 8.69
Various Dates	Photocopies (\$0.20 x 88)		\$ 17.60
		Total	\$ 8,863.59