

Arby Aiwazian (SBN 269827)
Joanna Ghosh (SBN 272479)
Selena Matavosian (SBN 348044)
LAWYERS for JUSTICE, PC
450 North Brand Boulevard, Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff Naron Triplett

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

LAVONTRA BREAUX, VANESSA
HERNANDEZ, 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.: 23SMCV04825

Honorable Carolyn B. Kuhl
Department 12

**DECLARATION OF SELENA
MATAVOSIAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date:
Time:
Department: 12

Complaint Filed: October 13, 2023
Trial Date: None Set

1 **DECLARATION OF SELENA MATAVOSIAN**

2 I, Selena Matavosian, hereby declare as follows:

3 1. I am an attorney licensed to practice law in the State of California. I am a member of
4 Lawyers *for* Justice, PC, attorneys of record for Plaintiff Naron Triplett (“Plaintiff Triplett”) in the action
5 entitled *Naron Triplett v. Pandora Ventures, LLC, et al.*, Superior Court of California for the County of
6 Los Angeles, Case No. 24STCV04697 (“Triplett Class Action”) and the action entitled *Naron Triplett v.*
7 *Pandora Ventures, LLC, et al.*, Superior Court of California for the County of Los Angeles, Case No.
8 24SMCV00844 (“Triplett PAGA Action”) (the Triplett Class Action and Triplett PAGA Action are
9 together referred to as the “Triplett Actions”). The facts set forth in this declaration are within my personal
10 knowledge or based on information and belief, and if called as a witness, I could and would competently
11 testify thereto.

12 **EXPERIENCE AND ADEQUACY OF LAWYERS *for* JUSTICE, PC**

13 2. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
14 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
15 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is the
16 attorney of record in well over a dozen employment-related putative class actions in both state and federal
17 courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating
18 complex wage-and-hour class and Private Attorneys General Act (“PAGA”) representative actions. The
19 firm has successfully litigated cases involving nearly every aspect of California wage and hour law,
20 including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums
21 wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of
22 business expenses, executive, administrative, and other overtime exemptions to the State of California and
23 federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. During
24 a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions
of dollars on behalf of thousands of individuals in California.

25 3. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers for Justice, PC. He
26 received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor
27 degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in
28 dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in

1 Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the
2 Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate
3 from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard
4 University. From approximately September 2002 to approximately December 2002, he served as a Judicial
5 Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit.
6 From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the
7 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In
8 December of 2004, he obtained a license to practice law from the California State Bar. Since in or around
9 October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the
10 prosecution of consumer and employment class actions. While employed by Lawyers *for* Justice PC, he
11 has argued over one hundred (100) motions, taken or defended over one hundred fifty (150) depositions,
12 prepared dozens of expert witnesses for deposition or trial, and attended over one hundred seventy-five
13 (175) mediations. Together with other attorneys at the firm, and in some cases in conjunction with co-
14 counsel, he has successfully litigated cases involving the executive, administrative, and other overtime
15 exemptions to the State of California and federal overtime compensation requirements. Under his
16 supervision, Lawyers *for* Justice, PC has successfully obtained class certification by contested motion
17 practice in approximately sixteen (16) 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 received his
20 Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He
21 earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007
22 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the
23 California Court of Appeal for the Second Appellate District. From approximately August 2008 to
24 approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of
25 the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in
26 2010. He is admitted to practice before all courts of the State of California and all United States District
27 Courts in the State of California. He has worked on many wage-and-hour class action and representative
28 action cases, taking the lead in taking and defending depositions, arguing motions, and attending
mediations. He has played an integral role in preparing matters for class certification, including and not

1 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court
2 Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.
3 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No. RG13680477).
4 Under his supervision, dozens of class action or representative action cases have resulted in settlements
5 that have been granted court approval. He has handled over one hundred and fifty (150) mediations and
6 worked on over two hundred and fifty (250) class action or representative action cases which have resulted
7 in settlement.

8 5. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a Bachelor
9 of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the
10 London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center
11 in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013) and She is
12 also admitted to practice in all U.S. District Courts in California, U.S. Ninth Circuit Court of Appeals, the
13 U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken
14 and defended dozens of depositions and successfully handled motion practice in class action cases
15 regarding discovery (including and not limited to, regarding class contact information), class certification
16 (both contested class certification and stipulated class certification), arbitration agreements, coordination,
17 and intervention. She has successfully handled briefing and oral arguments on appeal, and obtained notable
18 decisions regarding, Private Attorneys General Act claims and employer efforts to compel arbitration of
19 such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9
20 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v.*
21 *Superior Court* (2019) 8 Cal.5th175. She has significant experience with class actions, including and not
22 limited to working on cases to obtain class certification through contested motion practice and working on
23 cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot
24 study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting
25 of approximately 2,600 individuals). She has extensive experience with class action and/or representative
26 action settlements, and has handled this process in over five hundred (500) cases. Under her, Edwin
27 Aiwasian, and Arby Aiwasian's supervision, Lawyers *for* Justice, PC has handled the class certification
28 and court approval process for hundreds of class action and/or representative action matters that have
successfully resolved. Joanna Ghosh is a member of the California Employment Lawyers Association and,

on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

6. Yasmin Hosseini a Member of Lawyers *for* Justice, PC. She received her Bachelor of Arts degree from University of California, Santa Barbara in 2013 and earned her Juris Doctor degree from Pepperdine University School of Law in 2017. She was admitted to practice law in California in 2019, and is admitted to practice before all courts of the State of California and all federal district courts in the State of California. She has worked on many wage-and-hour action and PAGA representative cases, and her work has included, *inter alia*, researching and drafting pleadings, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, engaging in motion practice, claims evaluation and analysis, and making court appearances. Prior to working at Lawyers *for* Justice, PC, she represented filmmakers and talent, negotiating and structuring various types of agreements on their behalf. She is a member of the California Employment Lawyers Association, Beverly Hills Bar Association, and Iranian American Bar Association.

7. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Science degree from California State University, Northridge in 2019, and was the recipient of the Wildman Schumacher Scholarship. I earned a Juris Doctor degree from Southwestern Law School in 2022, and I was the recipient of the Witkin Award for Academic Excellence. I was admitted to practice law in California in 2022. I am admitted to practice before all courts of the State of California and all U.S. Federal District Courts in the State of California. I have worked on many wage-and-hour class action and PAGA representative cases, and my work on these cases has included, *inter alia*, researching and drafting pleadings and motion-related papers, administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement agreements, performing claims evaluation and analysis, and making court appearances.

BASIC INFORMATION ABOUT THE CASES AND REACHING THE SETTLEMENT

8. Lawyers *for* Justice, PC has been actively engaged in the litigation of this matter since the inception of the Triplett Actions, which were commenced by Plaintiff Triplett on February 23, 2024, and throughout their pendency. On May 8, 2024, the Court consolidated the Triplett Class Action and Triplett PAGA Action, and deemed the Triplett Class Action as the lead case. On August 4, 2025, the Court deemed the following actions as related: the Triplett Class Action, the Triplett PAGA Action, the action entitled *Lavontra Breaux v. Pandora Ventures, LLC*, Superior Court of California for the County of Los Angeles,

Case No. 23SMCV04825 (“Breux Action”), the action entitled *Vanessa Hernandez v. Pandora Ventures, LLC*, Superior Court of California for the County of Los Angeles, Case No. 24STCV04554 (“Hernandez Action”), and the action entitled *Kristine Ghukasyan v. Pandora Ventures, LLC, et al.*, Superior Court of California for the County of Los Angeles, Case No. 24STCV15396. The Triplett Class Action, Triplett PAGA Action, Breux Action, Hernandez Action, and the action entitled *Natalie Flores v. Pandora Ventures, LLC*, Superior Court of California for the County of Orange County, Case No. 30-2024-01377405-CU-OE-CXC (“Flores Action”) were mediated and resolved, and the parties anticipate filing an amended consolidated complaint to consolidate all the claims and allegations into a single complaint (collectively, the “Settled Actions”).

9. Lawyers *for* Justice, PC, counsel for Plaintiff Triplett, eventually joined forces with Sullivan & Yaeckel Law Group, APC, counsel for Plaintiff Lavontra Breux (“Plaintiff Breux”), Bokhour Law Group, P.C. and Falakassa Law, P.C., counsel for Plaintiff Natalie Flores (“Plaintiff Flores”), and Bibiyan Law Group, P.C., counsel for Plaintiff Vanessa Hernandez (“Plaintiff Hernandez”), and since then have been working cooperatively and in a coordinated fashion to pursue this matter and reach an outstanding settlement recovery (Plaintiff Triplett, Plaintiff Breux, Plaintiff Flores, and Plaintiff Hernandez are collectively referred to as “Plaintiffs”). Collectively, Lawyers *for* Justice, PC, Sullivan & Yaeckel Law Group, APC, Bokhour Law Group, P.C., Falakassa Law, P.C., and Bibiyan Law Group, P.C are referred to as “Class Counsel.”

10. Before initiating the lawsuit on behalf of Plaintiff Triplett, Lawyers *for* Justice, PC conducted extensive investigation and research into the facts and circumstances underlying the pertinent factual and legal issues and applicable law. This required thorough discussions and interviews between attorneys at our firm and Plaintiff Triplett, and research into the various legal issues involved in the cases, namely, the current state of the law as it applied to class certification, representative PAGA claims, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, Plaintiff Triplett’s claims and damages, and Defendants Pandora Jewelry, LLC and Pandora Ventures, LLC (together, Defendants”) (collectively with Plaintiffs, the “Parties”) defenses. After conducting initial investigation, our firm determined that Plaintiff Triplett’s claims were well-suited for class action and representative treatment owing to what appeared to be a common course of conduct affecting a similarly situated group of current and former non-exempt, hourly-paid employees of Defendants who were employed in the State of

California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest periods, and unreimbursed business expenses.

11. Collectively, Class Counsel investigated the veracity, strength, and scope of the claims, and worked on preparing the matter for class certification and trial, prior to reaching the Settlement. This matter has involved extensive and ongoing investigations, research into legal and factual issues, and formal and informal discovery. Class Counsel obtained information, documents, and data in the course of litigation and in connection with mediation and settlement negotiations. Class Counsel reviewed and analyzed a volume of information, documents, and data obtained from Plaintiffs, Defendants, and other sources, researched applicable law, and undertook analyses and calculations of the value of claims, damages, and penalties exposure. Class Counsel also met and conferred with Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, formal and informal discovery, and production of information, documents, and data in the course of litigation, and mediation and settlement negotiations. Other work that Class Counsel performed included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising the pleadings and motion-related papers; case management; claims assessment and evaluation; and preparing for and attending court proceedings, mediation, and settlement negotiations.

12. As outlined herein, the Parties have conducted significant investigations and exchange, review, and analysis of a volume of information, documents, and data obtained from Plaintiffs, Defendants, and other sources during the course of litigating the matter and in connection with mediation and settlement negotiations. This information, documents, and data provided a critical understanding of the nature of the work performed by putative class members and aggrieved employees, as well as Defendants' operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, and penalties valuation issues in connection with all phases of the litigation, and ultimately, in connection with the mediations and settlement negotiation process. Accordingly, sufficient investigation and review of information has taken place in order for the Parties to be sufficiently informed of the nature and extent of the claims, and to enable all parties to fully evaluate the Settlement for its fairness, adequacy, and reasonableness.

13. After conducting significant investigation of the facts and law during the prosecution of the matter, counsel for the Parties engaged in mediation and extensive settlement negotiations to try to resolve

1 the matter. These efforts included participating in mediation conducted by Steve Serratore, Esq., a well-
2 regarded mediator who is experienced in mediating complex labor and employment matters, on April 2,
3 2025. During all settlement discussions, the Parties conducted their negotiations at arm's length in an
4 adversarial position. In the course of the mediation and settlement negotiations, the Parties discussed all
5 aspects of the matter, including the risks and delays of further litigation, the risks to the parties of
6 proceeding with class certification, and/or trial, the law relating to, *inter alia*, class certification, off-the-
7 clock theory, meal and rest periods, PAGA representative claims, and wage-and-hour enforcement, as well
8 as the evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at a
9 settlement that was acceptable to all parties was not easy. After conducting extensive investigations, formal
10 and informal discovery, and settlement negotiations, and with the aid of the mediator's evaluations, the
11 Parties have agreed to resolve the matter given the legal issues relating to Plaintiffs' principal claims, as
12 well as the costs and risks to both sides that would attend further litigation, and the real possibility of no
13 recovery after years of litigation.

14 14. The Settlement provides for a Service Award in an amount not to exceed Ten Thousand
15 Dollars and Zero Cents (\$10,000.00) each to Plaintiffs. The contemplated Service Award is fair and
16 appropriate in light of the time and effort that Plaintiffs expended to pursue the matter. Plaintiffs were
17 available whenever Class Counsel needed them, actively tried to obtain and provide information, and spent
18 a substantial amount of time and effort providing the facts and evidence necessary to facilitate prosecution
19 of the matter. Accordingly, it is appropriate and just for Plaintiffs to each receive a reasonable Service
20 Award for their services in the matter, in addition to their individual settlement payments under the
21 Settlement.

22 15. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is
23 in the best interests of Plaintiffs, other Class Members, the State of California, and Aggrieved Employees.

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

26 Executed on this 2nd day of September 2025 at Glendale, California.

27 _____
28 Selena Matavosian