

D.LAW, INC.
Emil Davtyan (SBN 299363)
Emil@d.law
David Yeremian (SBN 226337)
d.yeremian@d.law
Alvin B. Lindsay (SBN 220236)
a.lindsay@d.law
Enoch J. Kim (SBN 261146)
e.kim@d.law
Arianna N. Razi (SBN 356930)
a.razi@d.law
450 N Brand Blvd, Suite 840
Glendale, CA 91203
Telephone: (818) 962- 6465
Facsimile: (818) 962-6469

[Additional Counsel listed on the following page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SISKIYOU**

JEREMY D. FRALEY and JERRY D.
HAGERTY, individuals on behalf of
themselves and others similarly situated,

Plaintiffs,

vs.

ROSEBURG FOREST PRODUCTS CO., an
Oregon corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 23CV05757

CLASS ACTION

Assigned for All Purposes To:
Hon. JoAnn Bicego
Dept.: 2

**DECLARATION OF DAVID YEREMIAN
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT AGREEMENT**

Date: October 23, 2025
Time: 09:30 a.m.
Dept.: 2

Hagerty v. Roseburg Forest Products Co.:
Case No: 23CV07660
Original Complaint filed: August 3, 2023
First Amended Complaint filed: October 9, 2023

Fraley v. Roseburg Forest Products Co.:
Case No: 23CV05757
Original Complaint filed: June 20, 2023
First Amended Complaint filed: October 6,
2023
Second Amended Complaint filed: February
25, 2025

1 **DAVID YEREMIAN & ASSOCIATES, INC.**

David Yeremian (SBN 226337)

2 d.yeremian@d.law

450 N Brand Blvd, Suite 840

3 Glendale, CA 91203

Telephone: (818) 962- 6465

4 Facsimile: (818) 962-6469

5 **UNITED EMPLOYEES LAW GROUP, PC**

6 Walter Haines (SBN 71075)

wbaines@uelglaw.com

7 8605 Santa Monica Blvd., #63354

West Hollywood, CA 90069

8 Telephone: (562) 256-1047

9 Facsimile: (562) 256-1006

10 Attorneys for Plaintiff Jerry D. Hagerty,
on behalf of himself and others similarly situated

11 **AEGIS LAW FIRM, PC**

12 SAMUEL A. WONG, State Bar No. 217104

KASHIF HAQUE, State Bar No. 218672

13 JESSICA L. CAMPBELL, State Bar No. 280626

9811 Irvine Center Drive, Suite 100

14 Telephone: (949) 379-6250

Facsimile: (949) 379-6251

15 Email: jcampbell@aegislawfirm.com

16 Attorneys for Plaintiff Jeremy D. Fraley,
17 on behalf of himself and others similarly situated

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

I, David Yermian, declare as follows:

2. All of the matters set forth herein are within my personal knowledge. I have represented Plaintiff and the putative Class since the inception of this matter and prior to consolidation with the Class and PAGA action against Defendant entitled *Fraley v. Roseburg Forest Products Co.* (herein referred to as the “Fraley Action”). The parties reached a settlement of the consolidated action as reflected in the Class Action and PAGA Settlement Agreement (“Settlement” or “Settlement Agreement”). I submit this Declaration in support of plaintiffs Jerry D. Hagerty’s and Jeremy D. Fraley’s (“Plaintiffs”) Motion for Final Approval of Class Action and PAGA Settlement Agreement (“Motion”). Plaintiffs’ counsel is herein referred to as Class Counsel.

17

18
19
20
21

22

23

24

25

26
27
28

1 counsel (including in the Central, Southern, Eastern, and Northern Districts of California), and I
2 have obtained six and seven-figure settlements against a range of Defendants, including Fortune
3 500 companies. These cases have involved the gamut of wage-and-hour claims, including claims
4 for failure to pay minimum wages, unpaid wages and overtime, failure to provide meal and rest
5 breaks, failure to reimburse necessary business expenses, inaccurate pay statements, and failure to
6 pay timely wages—similar to claims at issue in the present matter.

7 6. I am experienced in prosecuting employment matters, particularly class actions. In
8 addition to the present case, I am also class counsel for dozens of other putative wage-and-hour
9 class-action lawsuits pending in various state and federal jurisdictions throughout California.

10 7. My extensive experience in litigating employment wage and hour matters has been
11 integral in identifying legal issues, evaluating the strengths and weaknesses of a case, and
12 generally negotiating fair and reasonable class action settlements. Practice in the narrow field of
13 wage and hour litigation requires skill and knowledge concerning the constantly evolving
14 substantive law (state and federal), as well as the procedural law of class action litigation. In this
15 action, I am fully equipped to use the skills and knowledge I have developed through more than a
16 decade of prosecuting and defending wage and hour class actions to represent the interests of the
17 Class fairly and adequately. Therefore, on account of my resources, experience, and knowledge, I
18 am well qualified to act as class counsel and represent Plaintiff and the putative Class Members in
19 this action.

20 8. In the last several years, I have had several contested class cases certified. When
21 necessary, we pursue cases on appeal. Owing to my experience, I am well-qualified to assess the
22 PAGA and class claims in this action, evaluate the potential for settlement versus trial, and analyze
23 the defenses raised. I have negotiated over 100 class action settlements, including many involving
24 the same issues presented in this case. A selection of cases wherein I have served as lead or co-lead
25 class counsel includes: *Galavis v. Patina Restaurant Group, LLC* (LASC BC375225; class size
26 approx. 10,000; co-lead counsel); *Milford v. ADT Security Services, Inc.* (CACD CV08-2236; class
27 size approx. 2,000; lead counsel); *Carreon v. Wolfgang Puck Catering and Events, LLC* (LASC
28 BC398569; class size approx. 1,400; lead counsel); *Fluke v. RFG Oil, Inc.* (LASC BC403354; class

size approx. 1,400; lead counsel); *Urena v. Camachos Restaurant* (LASC BC365913; class size approx. 887; lead counsel); *Smith v. Rio Rancho Pontiac GMC Buick Inc.* (LASC BC391187; class size approx. 860; lead counsel); *Callela v. Dolce Group* (LASC BC364711; class size approx. 600; lead counsel); *Vasquez v. The Hollywood Pig n Whistle LP* (LASC BC335075; class size approx. 600; lead counsel); *Goldman v. Aorta Restaurant Operating LP* (LASC BC379688; class size approx. 300; lead counsel); *Sink-Crilly v. Centex Homes* (CACD CV09-2476; class size approx. 250; lead counsel); *Utley v. Cranbrook Partners Inc.* (LASC BC392813; class size approx. 200; lead counsel); *Garcia v. California Credits Group* (LASC BC353213; class size approx. 160; lead counsel); *Afanasyev v. Miller Infiniti, Inc.* (LASC BC350788; class size approx. 160; lead counsel); *Morris v. Gymboree, Inc.* (LASC BC393270; class size approx. 150; lead counsel); *Ortega v. AJC Sandblasting, Inc.* (LASC BC378806; class size approx. 140; lead counsel); *Lulejyan v. Jim Falk Motors of Beverly Hills, Inc.* (LASC BC398459; class size approx. 72; lead counsel); *Rylko v. The Griddle Café, Inc.* (LASC BC386126; class size approx. 70; lead counsel); *Healy v. Siemens IT Solutions and Services, Inc.* (Santa Clara Superior Court 108CV113479; class size approx. 60; lead counsel).

REQUEST FOR ATTORNEYS' FEES

9. I have been involved in this action from its inception and have dedicated at least **6.8** hours of my attorney time to it to date. I anticipate incurring additional hours in connection with settlement funding and disbursement. My current hourly rate is \$1,375, which is based on my 24 years of experience in a highly specialized area of law. Accordingly, I have incurred approximately **\$9,350.00** in attorneys' fees for the firm for my work on this action to date. For the Court's consideration of my hours and fees in the lodestar cross-check, please see the contemporaneous time records attached as **Exhibit 1** to the Declaration of Enoch J. Kim ("Kim Decl.") detailing the hours I have invested in litigating this action and some of the major tasks I have performed broken down chronologically.

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

Executed this 29th day of September 2025, at Glendale, California.


David Yeremian

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28