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Attorneys for Plaintiff,
PAUL WILLIAMS

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

PAUL WILLIAMS, an individual, on behalf of	)	Lead Case No.: 19STCV40072
himself and of all persons similarly situated,	)	[Related Case No.: 19STCV44876]
	)	
Plaintiff,	)	DECLARATION OF EMILIA A.
	)	ARUTUNIAN
vs.	)	
	)	
ZOOLOGICAL SOCEITY OF SAN DIEGO, a	)	Date: March 28, 2025
Corporation; and DOES 1-50, inclusive,	)	Time: 10:30 a.m.
	)	Judge: Hon. Richard S. Whitney
Defendants.	)	Dept.: 68
	)	

I, Emilia A. Arutunian, declare:

1. I am an attorney at law duly admitted to practice before all the courts of the State of California and an attorney of record for Plaintiff Paul Williams ("Plaintiff") in this matter. I have personal knowledge of the facts set forth in this declaration, and if called as a witness, could and would testify as to their accuracy.

2. I am making this declaration on behalf of my client, the named Plaintiff, the putative class members, and in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement ('Motion').

3. I am a seasoned litigation and trial attorney who has litigated numerous wage- and-hour class action cases, both for Defendants and for Plaintiffs. I have practiced California employment law for several years, including individual and representative actions on behalf of both employers and employees. I have worked on numerous class action cases in California, and in federal courts in other states since 2019.

4. I graduated with a Bachelor of Arts degree from San Diego State University in 2012, magna cum laude, with a major in Political Science, and a double minor in Russian and Interdisciplinary studies. I received my Juris Doctorate from University of San Diego School of Law in 2015. During law school, I externed for Chief Judge Larry Alan Burns, of the U.S. District Court for the Southern District of California.

5. My office has worked on this matter over the course of litigation since the filing of this lawsuit.

6. I have had class action litigation experience mostly in the area of employment class actions. I have experience in cases involving labor code violations and wage and hour claims. I have litigated similar wage and hour cases against other employers on behalf of employees. I have been approved as class counsel in California courts. It is this level of experience which enabled my firm to undertake the instant matter to successfully combat the resources of the defendant and its capable and experienced counsel.

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

Executed on October 18, 2024

E. Arutunian
Emilia A. Arutunian, Esq.