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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF RIVERSIDE**

11 SANDI ORTIZ CUEVAS and MARIA L.
12 YANEZ ZEPEDA, individually, on behalf of
13 all others similarly situated, and on behalf of
14 the State of California and other aggrieved
persons; JOSE LUIS RAMIREZ, individually,
and on behalf of all others similarly situated,

15 *Plaintiffs,*

16 v.

17 TMI AUTOMOTIVE PRODUCTS INC., a
California corporation; TMI PRODUCTS,
18 INC., a California corporation; IPC IMPORT
PARTS CONNECTION INC., A California
19 corporation; and DOES 1 through 10,
20 inclusive,

Defendants.

Case No. CVRI2304340

**DECLARATION OF DAVID ALAMI IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Date: August 14, 2026
Time: 8:30 a.m.
Dept: 1

DECLARATION OF DAVID ALAMI

I, DAVID ALAMI, declare as follows:

1. I am an attorney at law licensed to practice before all courts in the State of California. I am counsel for Plaintiff MARIA L. YANEZ ZEPEDA ("Plaintiff") in this matter. I am thoroughly familiar with and have personal knowledge of all of the facts set forth herein and if called and sworn as a witness, I could and would competently testify under oath thereto.

2. I submit this declaration in support of Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement.

3. I am currently a partner at Torus LLP. The Firm primarily prosecutes wage and hour cases, including class and Private Attorneys General Act of 2004 ("PAGA") actions on behalf of employees and others who have had their labor rights violated. The Firm and its attorneys, currently serve as plaintiffs' counsel of record in over 100 wage and hour class and/or PAGA actions pending throughout the State of California.

4. I was previously the founder and managing attorney at Alami Law Group, APC from 2020 to 2024 where I primarily handled wage and hour class and representative actions. Prior to founding Alami Law Group, APC, I worked at the Am 100 rated law firms of Jones Day and Nixon Peabody LLP where I gained extensive experience in most phases of litigation. At both firms, I handled and obtained resolution of numerous consumer and commercial litigation focused matters.

5. The attorneys working on this case have been appointed class counsel in many cases, through both contested motions and settlement approval motions.

6. I have been appointed class counsel and/or had my attorney's fees approved in dozens of class actions and/or representative PAGA actions.

7. I have also served as plaintiffs' counsel of record in several employment class actions and/or representative actions, including but not limited to: *Arellano v. Vision Scenery Corp., Inc.*, Case No. 21STCV35878 (Los Angeles County Superior Court); *Bermudez v. Rose Meat Services, Inc., et al.*, Case No. 23NWCv02948 (Los Angeles County Superior Court); *Bustillos v. California Wood Recycling, Inc., et al.*, Case No. 37-2023-00043737-CU-OE-NC (San Diego County Superior Court); *Carrillo v. Southwind Foods, LLC, et al.*, Case No.

23CMCV00878 (Los Angeles County Superior Court); *Corona v. Exquisite Apparel Corp, et al.*, Case No. 21STCV02421 (Los Angeles County Superior Court); *De Herrera v. Vision Media Management & Fulfillment, LLC*, Case No. 23CHCV01640 (Los Angeles County Superior Court); *Gonzalez v. El Monte Convalescent Hospital, et al.*, Case No. 23PSCV01876 (Los Angeles County Superior Court); *Graham v. Global Customer Services, Inc., et al.*, Case No. 23VECV03731 (Los Angeles County Superior Court); *Perez v. Red Hot Chilis, Inc., et al.*, Case No. 22STCV02369 (Los Angeles County Superior Court); *Ramirez v. J.J. Gourmet Food Corporation, et al.*, Case No. 23STCV24732 (Los Angeles County Superior Court); *Segoviano v. Villa Del Rio, Inc.*, Case No. 23STCV22612 (Los Angeles County Superior Court); *Villa v. Cal Door and Drawer, Inc., et al.*, Case No. 23CV422688 (Santa Clara County Superior Court); and *Wood v. Lyons Security Service, Inc., et al.*, Case No. 23NWCV02283 (Los Angeles County Superior Court).

8. As counsel for Plaintiffs and the proposed Settlement Class, I have been intimately involved in all aspects of this litigation, and I believe that the proposed Settlement is a good result for the Settlement Class. Class Counsel's hourly rates are comparable to those charged by other class action plaintiffs' counsel and the firms defending class actions.

Relevant Background

9. Plaintiff Zepeda filed a wage and hour class and PAGA representative action in Riverside County Superior Court, Case No. CVRI2305081 ("Zepeda Action"), on September 26, 2023, against Defendants. Prior to filing, Plaintiff exhausted administrative remedies through the Labor and Workforce Development Agency ("LWDA") by filing a notice alleging facts and theories of liability regarding several violations of the California Labor Code committed by Defendants. There was no response by the LWDA regarding its intent to investigate the claims alleged in the notice for more than 65 days. As such, Plaintiff Zepeda became authorized to commence a civil action under the PAGA.

10. On March 21, 2025, Plaintiffs Jose Luis Ramirez, Sandi Ortiz Cuevas, and Maria Yanez Zepeda (collectively, "Plaintiffs") and Defendants TMI Automotive Products, Inc., TMI Products, Inc., and IPC Import Parts Connection Inc. (collectively, "Defendants") (collectively, with Plaintiffs, the "Parties") participated in a formal mediation conducted by Christopher M. Barnes, a

1 neutral and respected mediator with extensive experience in complex wage and hour matters, and
2 with the assistance of the mediator's evaluations, the Parties were able to reach an agreement to
3 resolve the Ramirez Action, the case entitled Sandi Ortiz Cuevas v. TMI Automotive Products Inc.,
4 Riverside County Superior Court Case No. CVRI2304340, and the case entitled Maria Yanez
5 Zepeda v. TMI Automotive Products Inc., Riverside County Superior Court Case No. CVRI2305081
6 (collectively, "Actions"). The Parties then worked diligently to negotiate and memorialize the terms
7 in a long form settlement agreement.

8 11. On December 11, 2025, the Parties executed the Class Action and PAGA Settlement
9 Agreement ("Settlement" or "Settlement Agreement").

10 12. As explained in greater detail in Plaintiff's Motion for Preliminary Approval, filed
11 on December 29, 2025, Plaintiffs assert in this action that Defendants are liable on a class basis
12 for damages stemming from violations of California's wage and hour laws, including failure to
13 provide meal and rest breaks, failure to pay hourly and overtime wages, failure to pay sick time
14 and vacation wages, failure to reimburse business expenses, failure to pay interest on deposits,
15 failure to provide accurate wage statements, and failure to timely pay all wages at termination.

16 13. Plaintiffs also assert derivative claims under the Labor Code, and seeks civil
17 penalties pursuant to the Private Attorneys General Act of 2004 (Lab. Code §§ 2698, et seq.)
18 ("PAGA").

19 14. The Court granted the Motion for Preliminary Approval of Class Action
20 Settlement ("Preliminary Approval Motion") on April 2, 2026, finding that the Settlement appears
21 to be fair, adequate, and reasonable, and signed the Revised Order Granting Preliminary Approval
22 of Class Action Settlement (the "Preliminary Approval Order").

23 15. My office has been actively engaged in litigating this matter on behalf of Class
24 Members. During the course of this litigation, we have reviewed and analyzed numerous policy and
25 pay documents, including records and information produced by Defendants and worked to develop
26 information on liability and potential damages. Our investigations covered all aspects of the asserted
27 claims, including certification issues, merits issues, damages, the scope and configuration of Class
28 Members, the content and implementation of the wage and hour policies at issue, issues relating to

1 manageability concerns at trial, among other relevant areas. In addition, I participated in the
2 mediation. Based on the expected testimony from Plaintiffs and Class Members, a review of
3 Defendants' policies and procedures and other documents relating to the alleged claims, information
4 on the number of Class Members, Class Members' workweeks and pay periods, and a representative
5 sample of Class Members' payroll data, the scope of the potential damages to Plaintiffs and Class
6 Members in light of the claims alleged, the uncertainty in the law with regard to certification, and
7 the negotiations that have taken place, I am convinced that the proposed settlement is in the best
8 interest of the class. Potential class certification issues, the uncertainty of class certification,
9 difficulties of complex litigation, the length process of establishing specific damages and the
10 possibility of appeals were carefully considered in reaching this agreement.

11 16. I have reviewed the Declarations of Plaintiffs' counsel and agree with their
12 statements regarding the case history, the assessment of the value of Plaintiffs' claims, the mediation
13 that took place, and the discovery and investigations performed.

14 17. I have billed a total of 80.2 hours working on this case at a rate of \$850 per hour,
15 resulting in a lodestar of \$68,170. My hourly rate is comparable to those charged by other class and
16 PAGA plaintiffs' counsel and the firms defending class and PAGA action cases. An \$850.00 per
17 hour rate is reasonable considering my years of experience practicing law and my Laffey Matrix
18 rate as a ninth-year attorney (\$902 per hour). (The Laffey Matrix,
19 <http://www.laffeymatrix.com/see.html> [last visited July 21, 2026].) The Laffey Matrix is a "well
20 established objective source for rates that vary by experience" used by the District of Columbia. *In*
21 *re HPL Tech., Inc. Sec. Litig.* (N.D. Cal. 2005) 366 F. Supp 2d 912, 921. Class Counsel dedicated
22 significant resources to this case by dividing the tasks required according to skill level, and the
23 professional hours generated by each attorney are neither unreasonable nor duplicative. In addition,
24 Class Counsel incurred costs in the amount of \$5,616.15.

25 18. Shaheen A. Etemadi is an attorney at Torus LLP and primarily prosecutes wage
26 and hour class and PAGA actions. Mr. Etemadi has been appointed as class counsel and/or had
27 his attorney's fees approved in at dozens of actions. Mr. Etemadi also currently serves as counsel
28 of record for dozens of pending class and/or PAGA actions. Mr. Etemadi has billed a total of 62.40

1 hours working on this case at a rate of \$825 per hour, resulting in a lodestar of \$51,480. Mr.
2 Etemadi's rate is comparable to those charged by other class and PAGA plaintiff's counsel and the
3 firms defending class and PAGA action cases.

4 19. Class Counsel bore the risk and costs of litigation on a contingency basis and
5 dedicated significant resources by dividing necessary tasks according to experience level. My firm
6 has expended considerable time and effort on this case and will continue to do so through final
7 approval of the class action settlement.

8 20. Class Counsel dedicated significant resources to this case by dividing necessary
9 tasks according to skill level, and the professional hours generated by each attorney are neither
10 unreasonable nor duplicative.

11 **Reasonableness of Class Representative Enhancement Award**

12 21. Plaintiff contributed significantly to the prosecution and ultimate success of this
13 litigation, including but not limited to spending time speaking with their counsel, gathering
14 documents, assisting counsel in preparing for the mediation and reviewing settlement documents.
15 Moreover, Plaintiff faced the possibility of worsened career prospects from having sued an employer
16 in a wage-and-hour class action and a potential cost award against them if the litigation were lost.
17 Based on my extensive experience as plaintiff's counsel in similar wage-and-hour class actions, and
18 being equal to the Court's standard amount for service awards, the proposed incentive award of
19 \$7,500 is reasonable.

20 **Other Relevant Factors**

21 22. Neither I nor anyone at my firm have any conflict of interest with either the cy pres
22 beneficiary and or the designated settlement administrator.

23 23. I am not aware of any other pending actions against Defendants, other than the
24 Actions, in any other Court that the Settlement may impact.

25 **Exhibits**

26 1. A true and correct copy of my office's detailed explanations of tasks performed and
27 hours expended in this matter is attached hereto as **Exhibit 1**.

28 2. A true and correct copy of my office's costs incurred in this action is attached hereto

1 as **Exhibit 2.**

2
3 I declare under penalty of perjury under the laws of the State of California that the foregoing
4 is true and correct.

5 Executed on July 21, 2026 at Irvine, California.

6
7 

8 David Alami

EXHIBIT 1

Case No. CVRI 2304340

Torus LLP Attorney Hours Summary

Task Description	D. Alami	S. Etemadi
Case Initiation - Communicate with client; review client's employment records; research claims and case law; confer internally; draft/revise PAGA notice and Complaint, summons; prepare for service/filing;	14.2	12.5
Correspondences - Written communications with opposing counsel regarding case status, service, Plaintiffs' claims and Defendants' defenses, discovery, resolution, mediation, Defendants' financials, settlement, settlement approval requirements.	10.7	8.3
Informal Document Production / Investigation for Mediation - Draft correspondence and meet and confer re informal document production; Review/analyze thousands of entries of time and pay data for hundreds of employees; confer with damages expert; analyze sampling; review expert's damages analysis for follow up; contact potential witnesses; review competing cases and litigation history; confer internally; communications regarding the same.	18.1	15.2
Mediation (Preparation, Attendance, and Subsequent Negotiations) - Draft/revise mediation brief and supporting exhibits; Contact and interview witnesses; confer internally; review and analyze documents and data produced by Defendants; confer with expert; appear for and attend mediation; communicate with opposing counsel; conduct legal research re defense arguments; review/analyze Defendants' corporate structure; written correspondences with mediator.	22.8	17.9
Draft Settlement - Draft/revise Settlement Agreement, confer with client and internally; conduct legal research re approval procedure and court requirements; communicate internally and confer with opposing counsel.	0.8	0.2
Settlement Approval and Administration - Draft/revise motion for preliminary approval and supporting declarations and order; Class data and settlement calculation review; Confer with Settlement Administrator regarding calculations, distributions, and final approval logistics; Review reports from Settlement Administrator; Respond to class member calls and inquiries regarding the settlement and research relating thereto; Draft Motion for final approval and supporting declarations, review and finalize exhibits relating thereto; Legal research regarding approval issues and consolidating into a single action for approval purposes; Communications with opposing counsel regarding same, internal communications regarding same, communications with client regarding same. Includes estimated 10 hours for Counsel supervising final distributions and compliance with Court final approval order and attending compliance hearings.	2.3	0.2
Case Management - Review deadlines, case status, case docket, assignments, court orders and rulings; Update case status and tasks sheet; Update client re case status; calendaring deadlines; Confer internally re case management and disposition.	11.3	8.1

Task Description	D. Alami	S. Etemadi
Hourly Rate	850/hr	825/hr
TOTAL HOURS	80.2	62.4

Total Lodestar: \$119,650

EXHIBIT 2

TORUS LLP — Costs Summary

Item	Amount
PAGA Notice Filing Fee	\$75.00
First Legal - Filing Fees	\$1,608.30
First Legal - Filing Fees	\$13.30
First Legal - Filing Fees	\$13.30
First Legal - Filing Fees	\$14.00
First Legal - Filing Fees	\$15.75
First Legal - Filing Fees	\$15.75
First Legal - Filing Fees	\$15.75
First Legal - Filing Fees	\$15.75
First Legal - Filing Fees	\$18.30
First Legal - Filing Fees	\$18.30
Expert Fees (Bergers Consulting)	\$3,295.00
Cumulative mileage, postage, print & copy fees	\$354.35
First Legal - Additional anticipated filing and maintenance fees	\$175.00
TOTAL	\$5,616.15