

1 John G. Yslas (SBN 187324)
2 john.yslas@wilshirelawfirm.com
3 Diego Aviles (SBN 315533)
4 diego.aviles@wilshirelawfirm.com
5 Harry Erganyan (SBN 333091)
6 harry.erganyan@wilshirelawfirm.com
7 Mariam Nazaretyan (SBN 334154)
8 mariam.nazaretyan@wilshirelawfirm.com
9 Courtney M. Miller (SBN 327850)
10 courtney.miller@wilshirelawfirm.com
11 **WILSHIRE LAW FIRM, PLC**
12 660 S. Figueroa Street, Sky Lobby
13 Los Angeles, California 90017
14 Telephone: (213) 381-9988
15 Facsimile: (213) 381-9989

16 Attorneys for Plaintiffs
17 Leticia Haynes, Ezell Young,
18 Deborah Hooker, Robert White,
19 Frederick Howard, and Angel Howard

20 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
21 **FOR THE COUNTY OF SAN FRANCISCO**

22 LETICIA HAYNES, individually, and on
23 behalf of all others similarly situated,

24 *Plaintiff,*

25 v.

26 TOWER WAV LLC, a California limited
27 liability company; and DOES 1 through 10,
28 inclusive,

Defendants.

Case No.: CGC-22-603761

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

Action Filed: December 30, 2022

DECLARATION OF MICHAEL NOURMAND

I, Michael Nourmand, say and declare, as follows:

1. I am an attorney at law, duly licensed to practice before all the Courts of the State of California and I am the principal of The Nourmand Law Firm, APC, attorneys of record for plaintiff, David Villatoro ("Plaintiff"). As such, I am familiar with the file in this matter and if called as a witness I could and would competently testify to the following facts of my own personal knowledge.

2. This declaration is made in support of Plaintiffs Motion for Preliminary Approval.

3. I graduated from UCLA with a B.A. in Political Science (Cum Laude) in 1994.

Thereafter I attended Loyal Law school and graduated in May of 1998. I became a member of the California State Bar in December 1998. In September 1999, I along with my former business partner Bruce Kokozyan, started the law firm of Kokozyan & Nourmand LLP and began to represent plaintiffs in the area of personal injury, insurance bad-faith, employment law, wage and hour, and class actions. In June 2010, I dissolved my partnership at Kokozyan & Nourmand LLP and started The Nourmand Law Firm, APC exclusively representing plaintiffs in the areas of employment law, wage and hour, and class actions. Prior to starting my own law firm, I worked for a plaintiff's law firm, Rose, Klein & Marias, Law Offices of Gary Bostwick and externed at the U.S. Attorney's Office, Civil Fraud Division and U.S. Bankruptcy Court, Honorable Judge Barry Russell. I am admitted to practice in all state courts in California, the United States District Courts of California - Central District, Southern District, Northern District, Eastern District, Ninth Circuit Court of Appeal, and the United States Supreme Court. In July 2011 I was selected as one of 75 Top Labor & Employment Lawyers in California by the Daily Journal; in 2011 and 2012 I was selected as a Rising Star by Super Lawyers and from 2013 through 2026 I was selected as a Super Lawyer by Super Lawyers. I was selected for inclusion in The Best Lawyers in America from 2016 through 2026. I am also an active member of the California Employment Lawyer's Association ("CELA"), Consumer Attorneys of California ("CAOC"), National Employment Lawyer's Association ("NELA"), Consumer Attorneys Association of Los Angeles ("CAALA"), California State Bar, Labor and Employment Section, and the Los Angeles County Bar.

1 4. I am fully familiar with the legal and factual issues in this case, and have specific
2 experience litigating complex wage and hour actions as class actions, including employment cases
3 as set forth below.

4 5. Since opening my firm, I have served as lead counsel or co-class counsel in several
5 wage and hour class and/or representative actions seeking wages and penalties owed on behalf of
6 employees, asserting similar claims as the Plaintiffs' lawsuit, where I have been appointed as class
7 counsel:

8 (1) Superior Court of the State of California, County of Los Angeles, Spring
9 Street Courthouse, *Reid v. Cardinal Glass Industries, Inc., et al.*, Case No. BC633874.

10 (2) Superior Court of the State of California, County of San Joaquin, *Azpeitia,*
11 *et al. v. The Newark Group, Inc.*, Case No. STK-CV-UOE-2016-0012282.

12 (3) Superior Court of the State of California, County of Los Angeles, Spring
13 Street Courthouse, *Turner, et al. v. Providence Little Company of Mary Foundation, et al.*, Case
14 No. BC676996.

15 (4) Superior Court of the State of California, County of Kern, *Garza v. Frito-*
16 *Lay, Inc.*, Case No. CV-16-102730 D.L.

17 (5) Superior Court of the State of California, County of Los Angeles, Spring
18 Street Courthouse, *Winters v. The Dependable Companies, et al.*, Case No. BC623839.

19 (6) Superior Court of the State of California, County of Los Angeles, Spring
20 Street Courthouse, *Barretos v. Don Roberto Jewelers, Inc.*, Case No. BC495451.

21 (7) Superior Court of the State of California, Ventura County, *Morales, et al. v.*
22 *Southland Sod Farms Operations, Inc., et al.*, Case No. 56-2017-00496912-CU-OE-V.A.

23 (8) Superior Court of the State of California, Los Angeles County, Spring
24 Street Courthouse, *Castrejon, et al. v. Karen Kane, Inc., et al.*, Case Nos. BC537058 and
25 BC569548.

26 (9) United States District Court, Central District of California, *Balderas v. SPS*
27 *Technologies, LLC*, Case No. 2:14-cv-4036-CAS (VBKx).

28 ///

- 1 (10) Superior Court of the State of California, County of Los Angeles, Spring
2 Street Courthouse, *Levkovitch v. Premier Displays & Exhibits, Inc.*, Case No. BC628412.
- 3 (11) Superior Court of the State of California, County of Los Angeles, Spring
4 Street Courthouse, *Pena v. National Diversified Sales, Inc., et al.*, Case No. BC610019.
- 5 (12) Superior Court of the State of California, County of Los Angeles, Central
6 Civil West, *Cortez v. Darling International, Inc.*, Case No. BC525091.
- 7 (13) Superior Court of the State of California, County of Los Angeles, Spring
8 Street Courthouse, *Lopez v. Owens & Minor Distribution, Inc.*, Case No. BC613671.
- 9 (14) Superior Court of the State of California, County of Los Angeles, Spring
10 Street Courthouse, *Starks, et al. v. Mercury Air Cargo, Inc., et al.*, Case No. BC614067.
- 11 (15) Superior Court of the State of California, County of Los Angeles, Spring
12 Street Courthouse, *Calvo v. Craneveyor Corp, et al.*, Case No. BC634012.
- 13 (16) Superior Court of the State of California, County of Los Angeles, Spring
14 Street Courthouse, *Alvarez v. Norman's Nursery, Inc.*, Case No. BC592465.
- 15 (17) Superior Court of the State of California, County of Los Angeles, Central
16 Civil West, *Corlew v. Ferrellgas, Inc., et al.*, Case No. BC521730.
- 17 (18) Superior Court of the State of California, County of Los Angeles, Spring
18 Street Courthouse, *Vela v. Doorking, Inc.*, Case No. BC644377.
- 19 (19) Superior Court of the State of California, County of Los Angeles, Spring
20 Street Courthouse, *Shasheet, et al. v. Pacifica Hotel Company, et al.*, Case No. 603264 and
21 BC635444.
- 22 (20) Superior Court of the State of California, County of Los Angeles, Central
23 Civil West, *Kim, et al. v. Beverly Hills Properties, Inc., et al.*, Case No. BC503462 and
24 BC520587.
- 25 (21) Superior Court of the State of California, County of Los Angeles, Central
26 Civil West, *Benitez, et al. v. Aircraft Service International, Inc.*, Case No. BC534264.
- 27 (22) Superior Court of the State of California, County of Los Angeles, Central
28 Civil West, *Santoyo v. Consolidated Foundries, Inc., et al.*, Case No. BC612298.

1 (23) Superior Court of the State of California, County of Los Angeles, Central
2 Civil West, *Carreon v. Jonathan Louis International, LTD*, Case No. BC543678.

3 (24) Superior Court of the State of California, County of Los Angeles, Spring
4 Street Courthouse, *Garcia, et al. v. American International Industries*, Case No. BC560886.

5 (25) Superior Court of the State of California, County of Los Angeles, Central
6 Civil West, *Badios, et al. v. E.M. Pizza, Inc.*, Case No. BC495252.

7 6. On February 8, 2024, Plaintiff filed a wage and hour class action complaint against
8 Defendant with the Los Angeles Superior Court, Case No. 24STCV03367 alleging the following
9 causes of action: (1) Failure to Pay Overtime Wages; (2) Failure to Pay Sick Leave; (3) Failure to
10 Provide Meal Periods; (4) Failure to Provide Rest Periods; (5) Failure to Pay All Wages Upon
11 Termination; (6) Failure to Provide Accurate Wage Statement; and (7) Unfair Competition
12 (“Villatoro Action”).

13 7. On June 12, 2025, the San Francisco Superior Court entered an Order allowing
14 the first filed case entitled *Haynes, et al. v. Tower Wav, LLC, et al.*, Case No. CGC-22-603761
15 (“Haynes Action”) to file a First Amended Class Action Complaint which, among other things,
16 add Plaintiff to the Haynes Action. On June 23, 2025, the parties filed the First Amended
17 Complaint in the Haynes Action. On June 27, 2025, the Los Angeles Superior Court entered an
18 Order dismissing the Villatoro Action, without prejudice, in light of the fact that Plaintiff was
19 added to the Haynes Action.

20 8. On February 14, 2025, the parties attended mediation with Tagore Subramaniam,
21 Esq. (“Mr. Subramaniam”) which resulted in a tentative class/PAGA settlement.

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 9. In compliance with California Rules of Professional Conduct §1.5.1, Plaintiff
2 signed a retainer agreement with my office which contains a fee sharing provision. Plaintiff
3 consented to this provision. Furthermore, the parties have agreed that the attorney's fees to be
4 awarded by the Court will be split between plaintiffs' counsel as follows: 60% of the awarded
5 attorney's fees would be paid to Wilshire Law Firm; 30% of the awarded attorney's fees would
6 paid to Justice Law Corporation; and 10% of the awarded attorney's fees would be paid to The
7 Nourmand Law Firm, APC.

8 I declare under penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct this 28th day of July 2026, at Beverly Hills, California.

10
11 /s/ Michael Nourmand
Michael Nourmand