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Attorneys for Plaintiff Abdolla Kowighadoush,
on behalf of himself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

ABDOLLA KOWIGHADOUSH, an individual,
on behalf of himself and others similarly
situated,

Plaintiff,

vs.

NKSFB, LLC, a Delaware limited liability
company; and DOES 1 through 50, inclusive.

Case No. 23STCV23689

Assigned To:

Dept.: 14

**DECLARATION OF PEGGY J. REALI
IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF PAGA
SETTLEMENT AGREEMENT**

Motion for PAGA Approval Hearing Date:
Hearing Date: October 29, 2025
Time: 11:00 a.m.
Department: 14

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I, Peggy J. Reali, declare:

1. I am an attorney at law, duly licensed to practice before all of the Courts of the State of California, and since June 2022 am a partner of United Employees Law Group, PC (“UELG”) counsel of record for Plaintiff Abdolla Kowighadoush (“Plaintiff”) in this action. I am a member in good standing of the State Bar of California.

2. I make this Declaration in support of Plaintiff's Unopposed Motion for Approval of PAGA Representative Settlement. I make this Declaration based on my personal knowledge except for those matters which are stated on information and belief, or after a detailed review of UELG business records, and if called to testify I could and would competently testify to the matters contained in this Declaration.

3. The Settlement Agreement in this action is the result of vigorous and competent representation of Plaintiff, and arms'-length, contentious negotiations with Defendant to reach the best possible outcome for the Labor and Workforce Development Agency ("LWDA") and the aggrieved employees. Based on my extensive experience as counsel in many class and representative action settlements, I believe that the proposed Settlement is fair, reasonable, and adequate to the LWDA and the aggrieved employees.

4. I have been practicing law for 34 years, and I am highly experienced in actions of this nature. United Employees Law Group is law firm which is highly experienced in actions of this nature. During my tenure as partner at United Employees Law Group since 2022, I have litigated scores of wage and hour and PAGA actions. Prior to my engagement with UELG, since at least 2006, I have been class counsel and litigated and settled PAGA cases in numerous wage and hour class and PAGA actions in federal and state courts in California and in other states, through my position as owner of Reali Law, APC since 2017 and as an associate or of counsel with other reputed law firms.

5. United Employees Law Group has prosecuted this litigation solely on a contingent-fee basis and has been completely at risk that it would not receive any compensation for prosecuting claims against the Defendant.

6. United Employees Law Group has participated in this litigation and has performed work on behalf of Plaintiff since the inception of this litigation. The hours submitted with this declaration are solely for work performed on behalf of the LWDA and aggrieved employees in the above-titled California action and not any other state or federal matter.

7. I performed, among other things, the following general tasks related to this matter: consulted with co-counsel as to issues relating to the prosecution of this case; appeared at and participated in an all-day mediation in this matter on August 27, 2024; reviewed all settlement papers along with orders from the court, law and motion papers; and assisted with client liaison and other tasks assigned by lead counsel.

8. The hourly rate for my time is **\$725** per hour, which is my usual and customary hourly rate charged for my services in similar class and representative action lawsuits.

9. The total number of hours spent by me on this litigation is 11.20 hours through April 24, 2025, as categorized herein below:

- | | |
|---|-------------|
| • Appear and participate in mediation on August 27, 2024: | 10.00 hours |
| • Review pleadings, communications, mediation, settlement documents and various motions; discuss with co-counselors | 1.20 hours |

Total: 11.20 hours

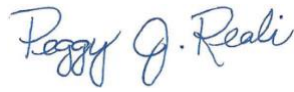
10. My total lodestar amount through April 24, 2025, is **\$8,120.00**.

11. I have no conflicts of interest with the aggrieved employees or with the named Plaintiff. I am not related to the representative Plaintiff. I have not previously represented Defendant in any matter. I do not represent opposing factions within the aggrieved employee group in that all claims are predicated upon the same theories of liability and benefit all aggrieved employees equally.

12. I believe that the Settlement is fair, adequate, and reasonable. The Settlement provides substantial monetary benefits to the LWDA and aggrieved employees and is a product of diligent efforts to obtain the best possible result for the LWDA and aggrieved employees. This

1 Settlement was reached following thorough legal and factual research and analysis, thorough
2 review of data relative to the claims in the action, arduous settlement negotiations, and thorough
3 investigation of the underlying facts by the respective parties and review of records. The settlement
4 negotiations were, at all times, adversarial and non-collusive in nature. In sum, I am well-suited to
5 act as counsel for Plaintiff and other aggrieved employees and will continue to vigorously
6 represent the interests of the LWDA and the aggrieved employees.

7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct. Executed this April 29, 2025, at San Diego, California.

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11 By:

Peggy J. Reali