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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 DAVID
YEREMIAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
APPROVAL OF PAGA SETTLEMENT
AGREEMENT**

Hearing Date: October 29, 2025
Time: 11:00 a.m.
Department: 14

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I, David Yeremian, declare:

1. I am an attorney licensed and admitted to practice before all courts of the State of California, the United States District Court for the Central, Southern, Eastern, and Northern Districts of California, and the Ninth Circuit Court of Appeals. I am the managing attorney of David Yeremian & Associates, Inc., Inc. My colleagues and I represent Plaintiff Abdolla Kowighadoush (“Plaintiff”) and a group of himself and other similarly situated employees of Defendant NKSFB LLC (“Plaintiff”) (collectively referred to herein as “the Parties”) in connection with their claims for unpaid wages and penalties under the Private Attorneys General Act (“PAGA”), Labor Code §§ 2698 *et seq.* My colleagues and I, along with the attorneys of D.Law, Inc. and Walter Haines of United Employees Law Firm, are referred to herein collectively as PAGA Counsel. I have personal knowledge of the facts and circumstances described herein, and if called as a witness, I could and would competently testify.

2. I have represented Plaintiff since the inception of this action. I submit this Declaration in support of the Plaintiff's Motion for Approval of PAGA Settlement Agreement ("Settlement" or "Settlement Agreement").

3. I do not believe I have any conflicts of interest with the Aggrieved Employees, if, or the State of California. I am not related to Plaintiff and have not previously represented Plaintiff in any matter. I respectfully submit that PAGA Counsel are well-suited to act as PAGA Counsel in this action, and we have and will continue to vigorously represent the interests of the Aggrieved Employees and the State of California.

QUALIFICATIONS AND ADEQUACY OF PAGA COUNSEL

4. David Yeremian & Associates, Inc. is well qualified because of our experience, knowledge, and resources to act as counsel and represent Plaintiff, the Aggrieved Employees, and the State of California in this action. My practice is exclusively focused on employment matters, with a substantial percentage devoted to litigating wage, hour, and working conditions violations on a statewide and representative PAGA basis.

5. I graduated from UC Berkeley in 1997 and received my law degree and MBA from in 2001. I am a member of the Los Angeles County Bar Association and the California

1 Employment Lawyers Association. I have been honored as a Super Lawyers Rising Star in 2009,
2 2010, 2012-2015. I was then honored as a Super Lawyer since 2016.

3 6. I have been practicing law since 2003. Since 2007, I have focused almost exclusively
4 on representing employees, including in wage-and-hour class and representative PAGA actions.
5 During my career, I have represented employees in hundreds of wage-and-hour class and PAGA
6 action lawsuits as lead or co-lead counsel (including in the Central, Southern, Eastern, and Northern
7 Districts of California), and I have obtained six and seven-figure settlements against a range of
8 defendants, including Fortune 500 companies. These cases have involved the gamut of wage-and-
9 hour claims and claims for civil and statutory penalties, including claims for failure to pay minimum
10 wages, unpaid wages, and overtime, failure to provide meal and rest breaks, failure to reimburse
11 necessary business expenses, inaccurate pay statements, failure to pay timely wages—similar to
12 claims at issue in the present matter.

13 7. I am experienced in prosecuting employment matters, particularly class and
14 representative PAGA actions. In addition to the present case, I am also class and/or PAGA counsel
15 in many other putative wage-and-hour class-action lawsuits pending in various state and federal
16 jurisdictions throughout California.

17 8. My extensive experience in litigating employment wage and hour matters has been
18 integral in identifying legal issues, evaluating the strengths and weaknesses of a case, and generally
19 negotiating fair and reasonable class and PAGA action settlements. Practice in the narrow field of
20 wage and hour and PAGA litigation requires skill and knowledge concerning the constantly evolving
21 substantive law (state and federal), as well as the procedural law of class action litigation and the
22 unique PAGA requirements. In this action, I am fully equipped to use the skills and knowledge I
23 have developed through more than a decade of prosecuting and defending wage and hour actions to
24 fairly and adequately represent the interests of the Aggrieved Employees. Therefore, on the account
25 of my resources, experience, and knowledge, I am well-qualified to act as PAGA Counsel and
26 represent Plaintiff, the Aggrieved Employees, and the State of California in this action.

27 9. In the last several years, I have had several contested class cases certified. When
28 necessary, we pursue cases on appeal. Based on my experience, I am well-qualified to evaluate the

class claims in this action and to evaluate settlement v. trial and defenses raised. I have negotiated hundreds of class and PAGA action settlements, including many involving the same issues presented in this case. A selection of exemplary cases wherein I have served as lead or co-lead class and PAGA counsel includes: *Galavis v. Patina Restaurant Group, LLC* (LASC BC375225; class size approx. 10,000; co-lead counsel); *Milford v. ADT Security Services, Inc.* (CACD CV08-2236; class size approx. 2,000; lead counsel); *Carreon v. Wolfgang Puck Catering and Events, LLC* (LASC 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); *Uitley 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).

10. I have invested at least 10 hours in this case to date, resulting in \$8,500.00 in attorneys' fees (\$850 per hour).

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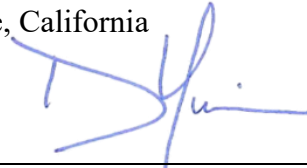
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1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3 Executed this April 29, 2025, at Glendale, California

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5 _____
6 David Yeremian