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Attorneys for Plaintiff,
JOSE RODRIGUEZ and the Proposed Class

(ADDITIONAL COUNSEL ON NEXT PAGE)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CATHERINE ANDERSON, as an
individual and on behalf of all others
similarly situated; JOSE RODRIGUEZ, as
an individual on behalf of himself and all
other similarly situated,

Plaintiffs,

vs.

KINDER MORGAN, INC., a Delaware
corporation; and DOES 1 through 100,
inclusive,

Defendants.

CASE NO. 23STCV25789

Assigned to the Hon. Laura A. Seigle, Dept.
SSC-17

**DECLARATION OF GEORGE S. AZADIAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT & PAGA
SETTLEMENT**

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CATHERINE ANDERSON and the Proposed Class

DECLARATION OF GEORGE S. AZADIAN

I, George S. Azadian, declare as follows:

1. I am an attorney at law duly licensed to practice before all of the courts of the State of California, and I am President of the Azadian Law Group, PC (“Class Counsel”) attorneys of record for Plaintiff Jose Rodriguez (“Plaintiff Rodriguez”) and the proposed settlement class (the “Class”) in the above-captioned matter.

2. Except as otherwise indicated, I have personal knowledge of all matters set forth herein and, if called as a witness, could and would competently testify thereto under oath.

3. I submit this declaration in support of Plaintiffs’ Motion for Final Approval of Class Action Settlement and PAGA Settlement (the “Motion”).

CONTINUED RECOMMENDATION OF CLASS COUNSEL & ADEQUACY

4. My prior Declaration In Support of Motion for Preliminary Approval (filed October 23, 2025) set forth the lengthy evaluation of each cause of action and potential damages for each cause of action, along with the related risks. Due to the length of the analysis of these factors, which the Court has already reviewed and ruled upon, that same analysis is not repeated here but is incorporated by this reference. (See Memorandum in Support of Motion for Preliminary Approval, at pgs. 14-25 (filed October 23, 2025); Azadian Decl. In Support of Motion for Preliminary Approval (filed October 23, 2025) ¶¶ 17-48.)

5. I am qualified to evaluate the risks and benefits of both litigation and settlement in this matter and continue to recommend this Settlement as fair and reasonable to the Class.

6. Class Counsel remains convinced that this settlement is in the best interest of the Class based on the negotiations and a detailed knowledge of the issues present in this action. The length and risks of trial and other normal perils of litigation that may have impacted the value of the claims were all weighed in reaching the proposed settlement. In addition, the affirmative defenses asserted by Defendant, as well as the uncertainty of class certification, the difficulties of complex litigation, the lengthy process of establishing specific damages and various possible delays and appeals, were also carefully considered by Class Counsel in agreeing to the Settlement.

1 7. To the best of my knowledge, neither Plaintiffs nor I nor my firm have any conflicts
2 of interest with the Class Members. Neither my office, myself or Plaintiffs have an interest in or
3 relationship with the administrator Phoenix Class Action Administration Solutions, who is proposed
4 as the Administrator of the Settlement.

5 8. Plaintiff Rodriguez is an adequate Class Representative. Plaintiff Rodriguez and the
6 Class Members have strong and co-extensive interests in this litigation because they all worked for
7 Defendant during the relevant time period, allegedly suffered the same alleged injuries from the same
8 alleged course of conduct, and there is no evidence of any conflict of interest between Plaintiff
9 Rodriguez and the Class Members.

10 9. Moreover, Plaintiff Rodriguez has demonstrated commitment to the Class by, among
11 other things, retaining experienced counsel, providing counsel with documents and extensively
12 speaking with counsel to assist in identifying the claims asserted in this case, meaningfully
13 participating in the mediation, and being exposed to the risk of attorneys' fees and costs awards
14 against Plaintiff if this lawsuit had been unsuccessful. Thus, Plaintiff Rodriguez is adequate to serve
15 as Class Representative. Accordingly, this Court should find that Plaintiff Rodriguez and Class
16 Counsel are adequate to represent the Settlement Class as required under Code of Civil Procedure
17 § 382.

18 10. Class Counsel is not aware of any pending matter or action asserting claims that will
19 be extinguished or adversely affected by the Settlement.

20 **AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION COSTS**

21 11. I graduated from UCLA School of Law in 2007, ranking number seven in my class.
22 After law school, I was an Associate Attorney at O'Melveny & Myers, LLP and Stroock & Stroock
23 & Lavan, LLP where I represented numerous clients in class action litigation. Through my years of
24 practice, I have also achieved the following awards and recognitions:

- 25 • Daily Journal Award for Top Labor & Employment Lawyers 2020.
- 26 • Daily Journal Award for Top 20 Boutiques in California (Azadian Law Group, PC,
27 was selected by the oldest and most respected legal publication in California, Daily
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Journal, as one of the top 20 boutique law firms in all of California. Boutique law firms are those that specialize in a niche area of law, such as labor and employment, appellate, bankruptcy, etc. The Daily Journal honor is one of the most coveted in California by any law firm and involves an intensive selection process with thousands of nominees of which only 20 law firms are selected to the list.)

- AV Preeminent® Rating by Martindale-Hubbell® Peer Review Ratings™ (For more than 130 years, lawyers have relied on the Martindale-Hubbell® peer review ratings while searching for their own expert attorneys. The Martindale-Hubbell® AV Preeminent® rating is the highest possible rating for an attorney for both ethical standards and legal ability. It is achieved only after an attorney has been reviewed and recommended by their peers – members of the bar and the judiciary.)
- Super Lawyers’ 2018-2026 “Super Lawyer” Award In Employment Litigation and Class Actions (Super Lawyers selects attorneys who have attained a high degree of peer recognition and personal achievement; less than 2% of the lawyers in the state are named on the list)
- Super Lawyers’ 2012-17 “Rising Star” Award In Employment Litigation and Class Actions
- Multi-Million Advocates Forum® and Million Dollar Advocates Forum®, Member (recognizing select attorneys with verified multi-million dollar results; less than 1% of the lawyers in the state are named on the list)

12. I have represented both plaintiffs and defendants in class actions and other complex matters. I have never been found inadequate to serve as class counsel and have been approved as class counsel in numerous class actions and PAGA actions, including: Dunlap v. Soho Horse LLC, Los Angeles Superior Court Case No. 25STCV09470; Ortiz v. Acrisure of California, Orange County Superior Court Case No. 30-2023-01365781-CU-OE-CXC; Nevels v. MSI Health Solutions, LLC, Los Angeles Superior Court Case No. 24STCV02453; Rivas v. Archdiocese of Los Angeles, Los Angeles Superior Court Case No. 22STCV38599; Keitz v. Apex Security Group, Inc., Santa

1 Clara Superior Court Case No. 22CV403171; Maheia v. Clean Earth Environmental Solutions, Inc.,
2 Los Angeles Superior Court Case No. 22STCV24279; Martinez v. Careonsite, Inc., Los Angeles
3 Superior Court Case No. 24STCV09662; Jenkins v. Golden Goose, S.P.A., Los Angeles Superior
4 Court Case No. 23STCV02244; Holybee v. Kimco Facility Services, LLC., Sacramento Superior
5 Court Case No. 34-2022-00327173; Rivkin v. LGO Hospitality, LLC., Los Angeles Superior Court
6 Case No. 22STCV11616; Alcala v. Glasswerks LA, Inc., Los Angeles Superior Court Case No.
7 22STCV32456; Bowlin v. Life Care Centers of America, Inc., Los Angeles Superior Court Case No.
8 BC657139; Harbour v. SOS Security LP, Santa Clara Superior Court Case No. 20CV362050; Kim v.
9 LeafFilter North, LLC, Orange County Superior Court Case No. 30-2019-01061296-CU-OE-CJC;
10 Melikyan v. Superhero Contractors, Inc., Los Angeles Superior Court Case No. 20STCV09955;
11 Tapia v. Frontwave Credit Union, USDC Southern District of California, Case No. 20-cv-1950;
12 Corona v. DS Services of America, Inc., Los Angeles Superior Court Case No. 19STCV03835; Celiz
13 v. Bottling Group LLC, Los Angeles Superior Court Case No. BC678071; Gretler v. Kaiser
14 Foundation Health Plan, Inc., CD Cal Case No. 18-cv-02175 AG; Castaneda v. SMCP USA, Inc.,
15 Los Angeles Superior Court Case No. BC687413; Dieda v. Rodra, Inc., Los Angeles Superior Court
16 Case No. BC677449; Martin v. Starbucks Corporation., Los Angeles Superior Court Case No.
17 BC582335; Gaa v. Intercare Holdings Inc., Los Angeles Superior Court Case No. BC488375; and
18 Irizarry v. Healthcare Services Group, Inc., Los Angeles Superior Court Case No. BC489570.

19 13. Ani Azadian graduated from Loyola Law School in 2011. After graduating from law
20 school, Ms. Azadian obtained the coveted position of a Judicial Law Clerk to the Honorable
21 Fernando M. Olguin (U.S. District Court for the Central District of California). In this role, Ms.
22 Azadian evaluated cases alongside the Judge and authored numerous Court decisions related to
23 Constitutional rights, labor and employment matters, and consumer rights. She also assisted the court
24 in weekly hearings and during complex trials. Prior to her clerkship, Ms. Azadian served as an extern
25 member of the judicial staff of the Honorable Arthur L. Alarcon in the Ninth Circuit Court of
26 Appeals and the Honorable Donna Fields Goldstein in the Los Angeles Superior Court. After
27 completing her clerkship, Ms. Azadian was recruited by the top firms in the country and worked as
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an Associate for the 140+ year-old New York-based, national firm, Stroock & Stroock & Lavan, which was the premier law firm specializing in financial services and class actions. There, she represented Fortune 500 companies in class actions. In 2016-2022, Ms. Azadian was also selected by Super Lawyers as a “Rising Star.” In 2023-2026, Ms. Azadian was selected by Super Lawyers as a “Super Lawyer.”

14. My firm maintains records of our hours worked on this case by billing our time in increments of one-tenth (1/10) of an hour. A review of my firm’s billing system records that to date, my firm has spent the following time on this matter:

Attorney	Hours	Rate	Pre-Multiplier Lodestar
George Azadian (18th Year Attorney)	48.6	\$775	\$37,665.00
Ani Azadian (13th Year Attorney)	3.1	\$700	\$2,170.00
Totals:	51.7		\$39,835.00

15. Included in the above is an additional estimated 3 hours for Mr. Azadian related to preparing for and appearing at the approval hearing, future interactions with the Settlement Administrator, ensuring accurate processing of the payments under the agreement, following up related to any uncashed checks and ensuring proper transmittal to California State Controller’s Office Unclaimed Property Fund, and related tasks.

16. The 2024-2025 Laffey Matrix states that an attorney with 11-19 years of experience can reasonably charge \$948 per hour. See <http://www.laffeymatrix.com/see.html>

17. However, that rate is derived from the Washington, D.C. area and requires a costs of living correction for Los Angeles. Using federal statistics for average attorney salaries, attorney pay is 4.9% lower in Los Angeles, compared to Washington, D.C., indicating a 4.9% downward adjustment to the Laffey Matrix is appropriate. [https://www.bls.gov/oes/current/oes231011.htm#\(9\)](https://www.bls.gov/oes/current/oes231011.htm#(9)) Using federal employee pay tables, federal employee wages are 1.58% higher in Los Angeles, compared to Washington, D.C., indicating a 1.58% upward adjustment to the Laffey Matrix is appropriate. <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2022/general-schedule/> Thus, something in the range of a 1.58% locality increase to a 4.9% locality reduction appears appropriate here and the hourly rates of Class Counsel are well below that amount.

1 18. The Laffey Matrix has been relied on by Courts in assessing the reasonableness of
2 hourly rates. See Tukes v. Richard, 81 Cal. App. 5th 1, 18 (2022) (“evidence establishing the
3 reasonable billing rate was of the same nature as that offered here—testimony from counsel based on
4 professional experience that aligned with a region-adjusted Laffey Matrix calculation.”).

5 19. Taking into account the experience of Class Counsel (detailed above), the requested
6 rates are very reasonable.

7 20. My office undertook the representation of Plaintiff Rodriguez on a contingent-fee
8 basis, which imposed a substantial risk that Class Counsel would spend years litigating a difficult
9 case against opponents represented by a highly respected defense firm, which required a tremendous
10 commitment of time, resources, and an outlay of massive expenses without any guarantee of being
11 paid a single dollar.

12 21. Plaintiff Catherine Anderson and Plaintiff Rodriguez have provided written
13 approval of the split of attorneys’ fees in this action (50% to Azadian Law Group, PC; 30% to
14 Haines Law Group, APC; and 20% to Lidman Law, APC).

15 22. In the prosecution of this action, Azadian Law Group, PC has incurred costs of
16 \$10,924.31. A true and correct copy of Azadian Law Group PC’s summary of costs in this case
17 through this date is attached hereto as **Exhibit 1**. These costs were all reasonable and necessary for
18 the prosecution of this case and are fair and reasonable.

19 **The Requested Service Payment To Plaintiff Rodriguez Is Reasonable**

20 23. The Settlement provides that Plaintiff Rodriguez will seek a Class Representative
21 Service Payment may seek a Service Payment of \$5,000. This amount is based on the extent of
22 Plaintiff Rodriguez’ assistance in this lawsuit, including providing relevant documents to Class
23 Counsel, reviewing and sorting his own records, participating in the settlement negotiation process,
24 and reviewing the settlement agreement and having related discussions.

25 24. Plaintiff Rodriguez also took on this action despite his fears that the public lawsuit
26 would be a stain on his record and ability to continue to earn a living in the future, as employers
27 generally do not favor individuals who file lawsuits against their former employers.

25. Also, Defendant insisted on Plaintiff Rodriguez providing Defendant with a release of any and all claims, known or unknown, he may have against Defendant. This is a significant sacrifice. By agreeing to settle the case in the best interest of the Class, Plaintiff Rodriguez was required to give up his individual rights to pursue any and all individual claims against Defendant.

26. Plaintiff Rodriguez' efforts are detailed in the previously filed Declaration of Plaintiff Rodolfo Ortiz In Support of Preliminary Approval (filed October 23, 2025), which is also concurrently filed.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed on March 31, 2026, in La Cañada, California.

George Abel.

GEORGE S. AZADIAN

EXHIBIT 1

EXHIBIT 1



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DATE	DESCRIPTION	COST
8/15/2023	FEDEX EMPLOYEE FILE REQUEST	\$13.20
9/28/2023	PAGA FILING FEE	\$75.00
9/28/2023	USPS LWDA NOTICE	\$8.53
9/28/2023	NATIONWIDE LEGAL INV#62668 - COMPLAINT, SUMMONS	\$1,684.95
10/4/2023	NATIONWIDE LEGAL INV# 63394	\$41.90
5/10/2024	JUDICATE WEST MEDIATOR PAYMENT, LESS REFUNDED AMOUNT OF \$4500	\$375.00
6/5/2024	MEDIATOR PAYMENT - MICHAEL LUDWIG	\$2,750.00
10/3/2024	BERGER CONSULTING GROUP - DAMAGES ANALYSIS	\$5,417.50
11/20/2025	NATIONWIDE LEGAL INV #93642 - MOTION FOR PRELIM APPROVAL	\$304.65
11/30/2025	NATIONWIDE LEGAL INV #96511 - SUPP BRIEF IN SUPPORT	\$56.25
1/2/2026	CASEANYWHERE INV #491599	\$79.33
2/2/2026	CASEANYWHERE INV #504580	\$59.00
3/2/2026	CASEANYWHERE INV #517897	\$59.00
	TOTAL:	\$10,924.31