

D.LAW, INC.

Natalie Haritounian (SBN 324318)

n.haritounian@d.law

Enoch J. Kim (SBN 261146)

e.kim@d.law

Matthew J. Carraher (SBN 346860)

m.carraher@d.law

Antonia McKee (SBN 344511)

a.bliznets@d.law

250 N Madison Ave, 2nd Floor

Pasadena, CA 91101

Telephone: (818) 962-6465 / Fax: (818) 962-6469

DAVID YEREMIAN & ASSOCIATES, INC.

David Yeremian (SBN 226337)

david@yeremianlaw.com

250 N Madison Ave, 2nd Floor

Pasadena, CA 91101

Telephone: (818) 962-6465 / Fax: (818) 962-6469

Attorneys for Plaintiff Deysi Campos,
on behalf of herself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN JOAQUIN

DEYSI CAMPOS, an individual on behalf of
herself and all others similarly situated,

Plaintiffs,

v.

MUSCO OLIVE PRODUCTS, INC, a
California corporation; MUSCO FAMILY
OLIVE CO., a business entity of unknown
form; FULL STEAM STAFFING, LLC, a
Florida limited liability company; and Does 1
to 50, inclusive,

Defendants.

CASE NO.: STK-CV-UOE-2023-10580

Assigned for All Purposes To:

Hon. Robert T. Waters

**DECLARATION OF DAVID YEREMIAN
IN SUPPORT OF PLAINTIFF'S MOTION
TO APPROVE PAGA SETTLEMENT**

Hearing Information:

Date: May 6, 2026

Time: 9:00 a.m.

Dept.: 11B

Action filed: October 5, 2023

FAC filed: December 8, 2023

Trial date: None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

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.

3. All of the matters set forth herein are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true. I have represented Plaintiff Campos and the aggrieved employees since the inception of this matter. I submit this Declaration in support of Plaintiff's Motion for Approval of PAGA Settlement under California Labor Code §§ 2698 *et seq.*

5. I am experienced in prosecuting employment matters, particularly PAGA actions. In addition to the present case, I am also class counsel and PAGA Counsel for dozens of other putative wage-and-hour class-action and PAGA lawsuits pending in various state and federal jurisdictions throughout California.

6. My extensive experience in litigating employment wage and hour matters has been integral in identifying legal issues, evaluating the strengths and weaknesses of a case, and generally negotiating fair and reasonable PAGA action settlements. Practice in the narrow field of wage and hour litigation requires skill and knowledge concerning the constantly evolving substantive law (state and federal), as well as the procedural law of class action and PAGA

1 litigation. In this action, I am fully equipped to use the skills and knowledge I have developed
2 through more than a decade of prosecuting and defending wage and hour class actions to fairly
3 and adequately represent the interests of the Aggrieved Employees. Therefore, on the account of
4 my resources, experience, and knowledge, I am well qualified to act as PAGA Counsel and
5 represent Plaintiff and the putative Aggrieved Employees in this action.

6 7. I am experienced in prosecuting employment matters, particularly class and
7 representative PAGA actions. In addition to the present case, I am also class or PAGA counsel for
8 other wage-and-hour class-action lawsuits pending in various counties throughout California
9 (including in federal courts). There follows a list of some of our recent class-action settlements
10 that have received preliminary or final approval: *Galavis v. Patina Restaurant Group, LLC*
11 (LASC BC375225; class size approx. 10,000; co-counsel); *Milford v. ADT Security Services, Inc.*
12 (CACD CV08-2236; class size approx. 2,000; lead counsel); *Carreon v. Wolfgang Puck Catering*
13 *and Events, LLC* (LASC BC398569; class size approx. 1,400; lead counsel); *Fluke v. RFG Oil,*
14 *Inc.* (LASC BC403354; class size approx. 1,400; lead counsel); *Urena v. Camachos Restaurant*
15 (LASC BC365913; class size approx. 887; lead counsel); *Smith v. Rio Rancho Pontiac GMC*
16 *Buick Inc.* (LASC BC391187; class size approx. 860; lead counsel); *Callela v. Dolce Group*
17 (LASC BC364711; class size approx. 600; lead counsel); *Vasquez v. The Hollywood Pig n*
18 *Whistle LP* (LASC BC335075; class size approx. 600; lead counsel); *Goldman v. Aorta*
19 *Restaurant Operating LP* (LASC BC379688; class size approx. 300; lead counsel); *Sink-Crilly v.*
20 *Centex Homes* (CACD CV09-2476; class size approx. 250; lead counsel); *Uiley v. Cranbrook*
21 *Partners Inc.* (LASC BC392813; class size approx. 200; lead counsel); *Garcia v. California*
22 *Credits Group* (LASC BC353213; class size approx. 160; lead counsel); *Afanasyev v. Miller*
23 *Infiniti, Inc.* (LASC BC350788; class size approx. 160; lead counsel); *Morris v. Gymboree, Inc.*
24 (LASC BC393270; class size approx. 150; lead counsel); *Ortega v. AJC Sandblasting, Inc.*
25 (LASC BC378806; class size approx. 140; lead counsel); *Lulejyan v. Jim Falk Motors of Beverly*
26 *Hills, Inc.* (LASC BC398459; class size approx. 72; lead counsel); *Rylko v. The Griddle Café,*
27 *Inc.* (LASC BC386126; class size approx. 70; lead counsel); *Healy v. Siemens IT Solutions and*
28 *Services, Inc.* (Santa Clara Superior Court 108CV113479; class size approx. 60; lead counsel).

8. I have spent approximately 9.3 hours on this matter, and my billable rate is \$1,375 per hour.

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

Executed this 10th day of April, 2026, at Pasadena, California.


David Yeremian