

1 MILLS SADAT DOWLAT LLP
Arash Sadat (SBN 279282)
2 Camron Dowlats Shahi (SBN 308618)
Mir Raza (SBN 358311)
3 515 South Flower Street, Suite 1000
Los Angeles, CA 90071
4 Tel.: (213) 628-3856
Email: arash@msdlawyers.com
5 Email: camron@msdlawyers.com
Email: mir@msdlawyers.com

6 Attorneys for Plaintiffs Christine Butler,
7 Mark Glowski, individually, and on behalf of
all others similarly situated
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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF NAPA**

12 CHRISTINE BUTLER and MARK
13 GLOWSKI, individuals, on behalf of
themselves and on behalf of all persons
14 similarly situated,

15 Plaintiffs,

16 v.

17 ANCHOR HEALTH, LLC, a Limited
Liability Company; and DOES 1 through 50,
18 inclusive,

19 Defendants.
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Case No. 24CV000278
Assigned To: Hon. Cynthia P. Smith

**CAMRON DOWLATSHAHI'S
DECLARATION IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS SETTLEMENT
AND AWARD OF ATTORNEYS' FEES,
COSTS AND SERVICE AWARDS**

HEARING INFORMATION:

DATE: October 9, 2026

TIME: 8:30 a.m.

DEPT.: A

Complaint Filed: February 26, 2024

Trial Date: None Set

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1 6. My current practice primarily involves employment law and advocating for the
2 rights of employees in wage-and-hour litigation through class and representative actions.

3 7. My hourly rate is \$950. Many of Mills Sadat Dowlat LLP's hourly clients pay this
4 hourly rate for my work. I have expended approximately 35 hours on this matter, including
5 evaluating the strengths and weaknesses of Plaintiffs' claims and potential exposure, conducting
6 and directing legal research on the operative wage-and-hour and PAGA issues, developing overall
7 case strategy and supervising the associate work product, negotiating and mediating with defense
8 counsel and Tripper Ortman, Esq. to resolve the matter, and communicating with the client
9 throughout the case regarding case posture, strategy, and resolution.

10 8. My firm has the experience, resources, and means necessary to allow us to provide
11 adequate representation as Class Counsel to all class members in this litigation.

12 9. Currently, my firm is acting as counsel in at least 90 wage-and-hour individual
13 actions and 20 wage-and-hour class actions.

14 10. Several of those matters include: *Roushion v. Path CCM, Inc. dba Rula Health*,
15 Case No. C26-02222 (Contra Costa County Superior Court, class size approx. 6,800); *Magana v.*
16 *Agero Administrative Service Corp., et al.*, Case No. C26-02828 (Contra Costa County Superior
17 Court, class size approx. 8,424); *Nations v. SAS Retail Services LLC*, Case No. C23-00122 (Contra
18 Costa County Superior Court, class size approx. 178); *Zhou v. Golden Bridge International*
19 *Logistics, LLC*, Case No. 24STCV05766 (Los Angeles Superior Court, class size approx. 63);
20 *Briones v. Shengyun LLC*, Case No. 30-2024-01388222-CU-OE-CXC (Orange County Superior
21 Court); *Boulware v. Vector Marketing Corporation*, Case No. 25CV151089 (Alameda Superior
22 Court, class size approx. 33,271); and *Marshall v. Tailored Shared Services, LLC, et al.*, Case No.
23 CIVSB2332636 (San Bernardino Superior Court, class size approx. 2,815). These matters reflect
24 MSD's ongoing commitment to representing employees in high-stakes wage-and-hour litigation
25 throughout the state.

26 11. I worked on this case with my partner, Arash Sadat. Mr. Sadat has been licensed to
27 practice law in California since 2011. He received his Bachelor of Arts degree in Sociology from
28 the University of California, Santa Barbara in 2004 and graduated cum laude from Loyola Law

1 School, Los Angeles. From 2011 through 2016, he worked as an associate at White & Case LLP,
2 a global law firm ranked in the AmLaw 10, where he specialized in complex commercial litigation
3 and white-collar defense. While at White & Case LLP, he represented clients in a variety of
4 business disputes, including in jury trials and arbitrations. Thereafter, he worked as an associate at
5 Brown White & Osborn LLP, a Southern California litigation boutique. In 2017, he founded Sadat
6 Law Group (now known as MSD). MSD specializes in employment litigation, business disputes,
7 and probate litigation.

8 12. Over his 13 years of litigation practice, Mr. Sadat has represented clients such as
9 Gerber Products Company, Nestlé USA, Comcast Corporation, LA Fitness International LLC, and
10 the Houston Rockets professional basketball franchise in business and consumer class action
11 litigation in various jurisdictions across the country. He has also represented clients in various
12 high-profile matters including in post-judgment proceedings in *Log Cabin Republicans v. United*
13 *States, et al.*, No. 2:04-cv-08425 (C.D. Cal.), a case in which the trial court struck down on
14 constitutional grounds the congressionally enacted "Don't Ask, Don't Tell" policy concerning
15 LGBTQ+ servicemembers in the military. While a partner at MSD, Mr. Sadat has represented
16 employees in hundreds of employment actions and has also represented clients such as Target
17 Corporation and the Government of Japan, in addition to numerous other businesses in litigation in
18 California and elsewhere. His hourly rate is \$950, and many of MSD's hourly clients pay this rate
19 for his work. Mr. Sadat has expended approximately 5 hours on this matter, consulting on overall
20 case strategy, providing senior-level input on litigation and settlement posture, and reviewing key
21 strategic decisions and research at critical stages of the case.

22 13. California courts have previously approved the rates charged by Mr. Sadat. *See,*
23 *e.g., 147-151 W. 25th St., LLC v. GRG Collective, et al.* (Los Angeles Super. Ct. June 5, 2023)
24 Case No. 19STCV07425; *Johnson v. Reliant Property Management, Inc.* (Solano County Super.
25 Ct. May 22, 2023) Case No. FCM176825.

26 14. Under my supervision, Mir Raza, an associate attorney at Mills Sadat Dowlat LLP,
27 assisted in litigating the case, preparing for mediation, and drafting the Motion for Final Approval
28 of Class and Representative Action Settlement.

1 15. Mr. Raza graduated magna cum laude from the University of California, Los
2 Angeles, with a Bachelor of Arts in Political Science and a minor in History in 2019. He earned
3 his Juris Doctor from Loyola Law School, Los Angeles in 2024. During law school, Mr. Raza
4 served as a law clerk for multiple government agencies, including the Los Angeles County
5 Counsel's Office, the Federal Public Defender's Office for the Central District of California, and
6 the National Labor Relations Board.

7 16. Mr. Raza became an Active Member of the State Bar of California in November
8 2024 and has been an Active Member in good standing continuously since. Mr. Raza is an
9 associate attorney at Mills Sadat Dowlat LLP and represents employees in all aspects of
10 employment litigation, including wage-and-hour class and representative actions involving claims
11 related to unpaid wages, meal and rest break violations, inaccurate wage statements, the California
12 Private Attorneys General Act, and unfair business practices. Mr. Raza's hourly rate is \$500. Mr.
13 Raza has expended approximately 25 hours on this matter, including conducting substantive legal
14 research on the wage-and-hour and PAGA claims and defenses, drafting and revising the
15 settlement agreement and related deal documents, drafting and revising motions and supporting
16 papers, and preparing correspondence with the client concerning case developments and
17 settlement.

18 17. Under my supervision, Isabella Fiorentino, a paralegal employed by Mills Sadat
19 Dowlat LLP, also assisted in preparing pleadings and in the preparation of this Motion for Final
20 Approval of Class Settlement. Ms. Fiorentino graduated cum laude from the University of
21 Pennsylvania, College of Arts and Sciences with a Bachelor of Arts in Philosophy, Politics, and
22 Economics and minors in Ancient History and Legal Studies and History from the College of Arts
23 and Sciences and Wharton School, respectively. Ms. Fiorentino has been employed by MSD since
24 2023 and has nearly three years of experience in litigation support, specializing in matters relating
25 to business litigation, employment actions, and personal injury. Ms. Fiorentino's hourly rate is
26 \$250. Ms. Fiorentino has expended approximately 8 hours on this matter, including handling
27 emails and correspondence, drafting motions and complaints, filing, court calendaring, service, and
28 case communications.

18. Under my supervision, Maria Lawhon, a paralegal employed by Mills Sadat Dowlatabadi LLP, also assisted in the preparation of this Motion for Final Approval of Class Settlement. Ms. Lawhon graduated magna cum laude from Crown College, with a Bachelor of Arts in International Relations and minors in Business Administration, Political Science, and Pre-Law. Ms. Lawhon has been employed by MSD since 2024, and prior to joining MSD she worked as a paralegal at Nepp & Hackert LLC for one year, giving her nearly three years of experience in litigation support, specializing in matters relating to business litigation, employment actions, and personal injury. Ms. Lawhon's hourly rate is \$300. Ms. Lawhon has expended approximately 2 hours on this matter.

2. MSD's Lodestar

19. Mills Sadat Dowlat LLP has kept contemporaneous time records reflecting the work performed by its attorneys and paralegals in this Action. Through September 14, 2026, MSD's total lodestar in this matter is \$53,100, based on the hourly rates identified above (\$950 for me and Mr. Sadat, \$500 for Mr. Raza, \$250 for Ms. Fiorentino, and \$300 for Ms. Lawhon). MSD expects to incur additional lodestar to complete the final approval process, oversee the settlement distribution, and respond to any class member inquiries.

3. MSD's Litigation Expenses

20. MSD has also incurred litigation expenses in the prosecution of this Action. Through September 14, 2026, MSD's total out-of-pocket litigation expenses are \$383.32, and consist of costs of the type normally billed to and paid by fee-paying clients, including filing fees, the firm's share of mediation expenses, expert consulting fees, and attorney service and court-filing charges. A true and correct itemization of these expenses is attached hereto as Exhibit A. These expenses were reasonably and necessarily incurred in the prosecution of this Action.

4. Support for Final Approval

21. I have participated in every aspect of the settlement negotiations, drafting, and implementation of the Class Action and PAGA Settlement Agreement. Based on my experience litigating and resolving wage-and-hour class and representative actions, and based on my analysis

1 of the claims, defenses, and risks presented in this Action, I believe the Settlement is fair,

2 adequate, and reasonable and in the best interests of the Class and aggrieved employees.

3 22. I am informed and believe, based on the Declaration of the Settlement

4 Administrator, that no Class Member has objected to the Settlement and no Class Member has

5 requested exclusion, such that 100% of the Class will participate in the Settlement. In my

6 experience, this uniformly favorable reaction from the Class further supports final approval of the

7 Settlement and the requested attorneys' fees, costs, and service awards.

9 I declare under penalty of perjury under the laws of the State of California that the

10 foregoing is true and correct on September 9, 2026, at Los Angeles, California.

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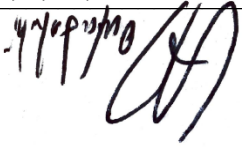


EXHIBIT A

Date	User	Description	Amount
03/29/24		Nationwide Legal: Mark Glowski – Certified Mail Fee for Demand for Personnel File and Payroll Records	\$35.81
05/06/24		Nationwide Legal: Mark Glowski - Certified Mail Fee for Notice of Claim Under Private Attorneys General Act (“PAGA”)	\$35.81
03/18/25		Chartsquad: Mark Stanley Glowski - Fee for Medical Records	\$5.00
03/20/25		Chartsquad: Mark Stanley Glowski - Fee for Medical Records	\$45.00
03/20/25		Chartsquad: Mark Stanley Glowski - Fee for Medical Records	\$15.00
03/20/25		Chartsquad: Mark Stanley Glowski - Fee for Medical Records	\$45.00
03/21/25		Chartsquad: Mark Stanley Glowski - Fee for Medical Records	\$45.00
03/21/25		Chartsquad: Mark Stanley Glowski - Fee for Medical Records	\$45.00
03/21/25		Chartsquad: Mark Stanley Glowski - Fee for Medical Records	\$15.00
08/20/25	CJ	OneLegal: Mark Glowski - Filing Fee for Case Management Conference Statement Filed	\$23.63
12/04/25	CJ	OneLegal: Mark Glowski - Filing Fee for Case Management Conference Statement Filed	\$23.63
01/30/26	CJ	OneLegal: Mark Glowski - Filing Fee for Case Management Conference Statement Filed (Anchor Health Class Action)	\$24.73
04/01/26		OneLegal: Mark Glowski - Filing Fee for Case Management Conference Statement Filed	\$24.73
TOTAL			\$383.34