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Attorneys for Plaintiffs ERIC ROBINSON
on behalf of himself and on behalf of all other
aggrieved employees

[Additional Counsel listed on following page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

ERIC ROBINSON and DAVID NUNEZ,
on behalf of all other aggrieved employees,

Plaintiff,

vs.

QUIDEL CORPORATION dba QUIDEL, a
Delaware corporation; QUIDELORTHO
CORPORATION dba QUIDELORTHO, a
Delaware corporation; QUIDEL
CARDIOVASCULAR INC. dba
QUIDELCARDIOVASCULAR, a
Delaware corporation; EASTRIDGE
WORKFORCE TECHNOLOGY, INC. dba
EASTRIDGE WORKFORCE
SOLUTIONS, a California corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 37-2023-00054933-CU-OE-CTL

Assigned for All Purposes To:
Hon. Marcella O McLaughlin
Dept.: C-72

**DECLARATION OF DAVID YEREMIAN
IN SUPPORT OF PLAINTIFFS' MOTION
TO APPROVE THE PRIVATE
ATTORNEYS GENERAL ACT
SETTLEMENT AND RELEASE UNDER
CALIFORNIA LABOR CODE §§ 2698 *et*
*seq.***

*[filed concurrently with Plaintiff's Notice of
Motion and Motion to Approve Settlement;
Declaration of Enoch J. Kim; Declaration of
Kelsey M. Szamet; Declaration of William Zev
Abramson; Declaration of Julie Green; and
[Proposed] Order]*

Date: November 14, 2025
Time: 9:30 a.m.
Dept.: C-72

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12 on behalf of all other aggrieved employees
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1 wage and hour litigation requires skill and knowledge concerning the constantly evolving
2 substantive law (state and federal), as well as the procedural law of class action and PAGA
3 litigation. In this action, I am fully equipped to use the skills and knowledge I have developed
4 through more than a decade of prosecuting and defending wage and hour class actions to fairly
5 and adequately represent the interests of the Aggrieved Employees. Therefore, on the account of
6 my resources, experience, and knowledge, I am well qualified to act as PAGA Counsel and
7 represent Plaintiff and the putative Aggrieved Employees in this action.

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

1 *Inc. (LASC BC386126; class size approx. 70; lead counsel); Healy v. Siemens IT Solutions and*
2 *Services, Inc. (Santa Clara Superior Court 108CV113479; class size approx. 60; lead counsel).*

3 8. I have spent approximately 15 hours on this matter.

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

6 Executed this 22nd day of October, 2025, at Glendale, California.

7
8 /s/ David Yeremian
David Yeremian