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11 Attorneys for Plaintiff, KIMMY DAO

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **FOR THE COUNTY OF SAN FRANCISCO**

14 KIMMY DAO, an individual,

15 Plaintiffs,

16 vs.

17 PANDORA KARAOKE, INC., a California
18 Corporation; URBAN LIFE INC., a
19 California Corporation, TIMMY CHOY, an
20 individual; and DOES 1 to 50 inclusive,

21 Defendants.

Case No.: CGC-24-611422

**DECLARATION OF DAVID JAFARI IN
SUPPORT OF MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

Department: 206
Judge: Hon. Rochelle East
Trial Date: 09/15/2025
Complaint Filed: 01/05/2024

Hearing: 12/02/2025
Hearing Time: 9:30 A.M.
Law & Motion Department 302

Filed Herewith:

1. Notice of Motion and Motion;
Memorandum of Points and Authorities
2. Declaration of Eli Hamblet with Exhibits
3. Declaration of David Jafari
4. Declaration of Saul Acherman
5. [Proposed] Order

1 I, David Jafari, declare as follows:

2 1. I am an attorney duly licensed to practice law, and I am counsel for Plaintiff KIMMY
3 DAO in this action. This declaration is submitted in support of Plaintiff KIMMY DAO's MOTION
4 FOR APPROVAL OF PAGA SETTLEMENT. The following facts are within my personal
5 knowledge and, if called as a witness herein, I can and will competently testify thereto.

6 2. Jafari Law Group, Inc. is well regarded as a firm that handles employment matters
7 both individual, class and PAGA. I, Saul Acherman, and Eli Hamblet of Jafari Law Group have
8 worked together to add our combined experience in similar litigation as class and PAGA Counsel
9 to ensure that the proposed settlement was the product of serious, informed, and non-collusive
10 negotiations, and represents a fair and reasonable settlement taking into account all the facts
11 and circumstances of the litigation. Defendants' Counsel Nardell Chitsaz & Associates LLP is
12 also a well-regarded as a firm that handles employment matters.

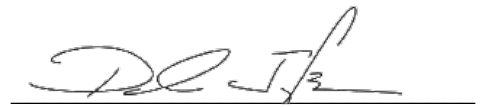
13 3. In evaluating the risks and cost of litigation against the potential benefits of this
14 settlement it is my opinion that this settlement is fair, reasonable and adequate.

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16 Executed this November 12, 2025, in Irvine, CA

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David Jafari

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