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Attorneys for Plaintiffs Yadira Rodriguez Roman,
as an individual and on behalf all others similarly situated

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

YADIRA RODRIGUEZ ROMAN and DONALD
CLEVINGER, as individuals and on behalf of all
employees similarly situated,

Plaintiffs,

v.

TC CALIFORNIA HOSPITALITY LLC, a California
Limited Liability Company; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 37-2024-00010785-CU-OE-
CTL

[Assigned for all purposes to Hon.
Richard S. Whitney, Department C-68]

**CLASS AND PAGA
REPRESENTATIVE ACTION**

**DECLARATION OF SAHAG
MAJARIAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS AND PAGA
REPRESENTATIVE ACTION
SETTLEMENT**

Date: August 22, 2025
Time: 10:30 a.m.
Courtroom: Dept. C-68
Judge: Hon. Richard S. Whitney

Action Filed: March 7, 2024
Trial Date: Not Set

DECLARATION OF SAHAG MAJARIAN II

I, SAHAG MAJARIAN II, hereby declare:

1. I am an attorney duly licensed to practice in the State of California and am one of the attorneys at Majarian Law Group, APC, co-counsel to Plaintiff Yadira Rodriguez Roman in this action against Defendant TC Hospitality. I have personal knowledge of the following, and if called and sworn as a witness, I could and would competently testify thereto. This declaration is made in support of approval of the class and PAGA representative action settlement in this case.

2. I graduated from Loyola Law School in 1990. Since my graduation, I have been in private practice primarily representing consumers against insurance companies and workers against their employers. I have devoted a significant portion of my practice to employment law and class actions, and have been appointed co-class counsel for the plaintiffs in no less than 300 wage and hour class actions. A sample of these cases are: *Ayvazi v. Ralph Grocery Company*, LASC Case No. BC 382980; *Sandoval vs. Chevron Stations, Inc.*, MCSC Case No. CV061690; *Nieves v. Roy's Worldwide, Inc.*, OCSC Case No. 06CC0076; *Corado v. Good Year Rubber Corp.*, SBSC Case No. RCV095476; *Pleitez v. Johnson Controls*, LASC Case No. BC353315; *Serrano v. BC/ Coca Cola Bottling Co. of L.A.*, LASC Case No. BC349904; *Urbina v. Valley Crest Co.*, LASC Case No. BC356023; *Moraza v. OK International*, OCSC Case No. 06CC0148; *Deluna v. Target*, LASC Case No. BC353080; *Daglian v. Staples, Inc.*, LASC Case No. BC375325; *McCoy v. Kimko*, OCSC Case No. 07CC00007; *Ayvazi v. Ralphs Grocery Company*, LASC Case No. BC382980; *Razo v. C & D Zodiac, Inc.*, OCSC Case No 07-CC01373; *Sandoval v. Chevron Stations, Inc.* MCSC Case No. CV061690; and *Gomez v. Spenuzza, Inc. et al*, RCSC Case No RIC524075.

3. In the employment class action arena, I have participated in over 300 class and/or PAGA action mediations. My participation has included extensive preparation, development of thorough knowledge of the legal issues related to certification and liability, and full immersion and

1 participation in the mediation and negotiation process. I have also been designated co-class counsel in
 2 various cases where we prevailed in contested class certification motions. These cases include *Herrera*
 3 *v. Mountain Meadow Mushroom Farms, Inc.*, SDCSC Case No. 37-2009-00092416- CU-MT-CTI;
 4 *Aguirre v. California Drop Forge, Inc.*, LASC Case No. BC374521; *Marroquin v. Swissport North*
 5 *America, Inc.*, LASC Case No. BC390001; and *Romero v. Hydraulics International, Inc.*, LASC Case
 6 No. 19STCV04463.

8 4. Throughout my thirty-five year career in law, my practice has been exclusively
 9 contingent fee work. Within the class action arena, I have been designated co-class counsel in no less
 10 than 30 class actions that have settled for over \$1 million each. Given my success and experience, in
 11 my contingent fee practice I have averaged over \$850 per hour worked. Therefore, I believe it is
 12 appropriate to set my lodestar at no less than \$850 per hour in this case. This request is fair in view of
 13 the much higher rate per hour that can be justified by the broadly accepted Laffey Matrix which shows
 14 hourly rate of \$1,141 for attorneys out of law school for more than 20 years.

16 5. Garen Majarian is the principal of Majarian Law Group. He graduated from Loyola
 17 Law School in 2020 and was admitted to the State Bar of California in January of 2021. His billing
 18 rate is reasonable at \$500 per hour which is less than the Laffey Matrix hourly rate of \$581 per hour.

19 6. My firm's involvement in this case has included legal research, investigation,
 20 communication with client and co-counsel and coordination of efforts in litigation. Based upon the
 21 totality of circumstances, I believe that the result achieved in this case is an extremely good outcome
 22 for all class members, aggrieved employees and the State of California.

24 7. Majarian Law Group, APC was approached by Plaintiff Yadira Rodriguez Roman in
 25 connection with potential employment law claims she believed she had against Defendant. After
 26 investigating the facts and analysis of the records, our co-counsel Tunyan Law, APC and Majarian
 27 Law Group, APC proceeded with the filing of a class and PAGA action against Defendant.

10. My firm does not have any conflict of interest with Phoenix Class Action Administration Solutions.

—DocuSigned by:

~~3142D0828E6E4A2~~

DECLARATION OF SAHAG MAJARIAN IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS
AND PAGA SETTLEMENT

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)

) ss

3 COUNTY OF LOS ANGELES)

4 I am employed in the county of Los Angeles, State of California. I am over the age of
5 18 and not a party to the within action; my business address is 535 N Brand Blvd. Suite 285,
Glendale, California 91203.

6 On the date indicated below, I served the document described as: **DECLARATION OF**
7 **SAHAG MAJARIAN IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY**
8 **APPROVAL OF CLASS AND PAGA REPRESENTATIVE ACTION SETTLEMENT** on
the interested parties in this action by sending a true copy thereof to interested parties as follows
and as stated on the attached service list:

9
10 Claudia Kozlowska
Claudia.Kozlowska@jacksonlewis.com

Mia Faber

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Adam Y Siegel

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16 225 Broadway, Suite 1800

San Diego, CA 92101

17 Direct: (619) 881 4484

Main: (619) 573 4900

18 *Attorneys for Defendant TC CALIFORNIA HOSPITALITY LLC*

19 [✓] **BY E-MAIL:** I hereby certify that this document was served from Glendale, California,
20 by e-mail delivery on the parties listed herein at their most recent known e-mail address
or e-mail of record in this action.

21 [✓] **BY ELECTRONIC SERVICE:** Based on an agreement of the parties to accept
22 electronic service, I caused the documents to be sent to the persons at the electronic
service addresses listed above via electronic mail. I did not receive an error message.

23
24 I declare under penalty of perjury under the laws of the State of California that the
above is true and correct.

25 Executed on July 21, 2025, at Glendale, California.

26
27 Natalia Zevallos

28 Name



Signature

PROOF OF SERVICE