

Lilit Tunyan (SBN 329351)
ltunyan@tunyanlaw.com
Artur Tunyan (SBN 349174)
atunyan@tunyanlaw.com
TUNYAN LAW, APC
535 N. Brand Blvd., Suite 285
Glendale, California 91203
Telephone: (323) 410-5050

Garen Majarian (SBN 334104)
garen@majarianlawgroup.com
Sahag Majarian, II (SBN 146621)
sahag@majarianlawgroup.com
MAJARIAN LAW GROUP, APC
18250 Ventura Boulevard
Tarzana, California 91356
Telephone: (818) 609-0807
Facsimile: (818) 609-0802

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
CLEVENGER, 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 FINAL
APPROVAL OF CLASS AND PAGA
REPRESENTATIVE ACTION
SETTLEMENT**

Date: January 9, 2026
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. 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 final approval of the class and PAGA 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 participation in the mediation and negotiation process. I have also been designated co-class counsel in

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

6
7 4. Throughout my thirty-five year career in law, my practice has been exclusively
8 contingent fee work. Within the class action arena, I have been designated co-class counsel in no less
9 than 30 class actions that have settled for over \$1 million each. Given my success and experience, in
10 my contingent fee practice I have averaged over \$850 per hour worked. Therefore, I believe it is
11 appropriate to set my lodestar at no less than \$850 per hour in this case. This request is fair in view of
12 the much higher rate per hour that can be justified by the broadly accepted Laffey Matrix which shows
13 hourly rate of \$1,141 for attorneys out of law school for more than 20 years.

14
15 5. My firm's involvement in this case has included legal research, investigation, and
16 communication with client and co-counsel. This case resolved following a full day mediation with an
17 experienced and well-respected mediator, Steven Rottman who played an instrumental role in getting
18 the parties on common ground and achieved the resolution of the case. Based upon the totality of
19 circumstances, I believe that the result achieved in this case is an extremely good outcome for all class
20 members and aggrieved employees.

21
22 6. Based on my experience as Class and PAGA counsel in other employment cases and
23 given the legal and factual realities presented in this case, I believe the proposed settlement is fair,
24 reasonable and adequate for the class and the aggrieved employees.

25 7. My office was approached by Plaintiff Yadira Rodriguez Roman February of 2024 in
26 connection with potential employment law claims she believed she had against Defendant. After
27 investigating the facts and analysis of the records, my co-counsels at Tunyan Law, APC and our office
28 proceeded with the filing of a class and PAGA action against Defendant.

8. Throughout the past twenty months, I have been involved in the handling of this case. My work on this case has included pre-litigation research and investigation regarding the Labor Code violations, analysis of the employment records, communication with client, and coordination of efforts with my co-counsel leading to resolution of the case.

9. Majarian Law Group, APC undertook this matter on a purely contingent fee basis with no guarantee that the time expended would result in any recovery or recoupment of costs. Throughout the past twenty month, I have spent a total of 21.90 hours in this case. Details of the hours spent are as follows:

Communication with client and co-counsel	2.80 hours
Legal research	0.90 hours
Review of documents	2.30 hours
Analysis of records	2.70 hours
Preparation for mediation	5.80 hours
Attendance at mediation	6.90 hours
Preparation of declaration	0.50 hours

10. Based on my billing rate of \$850 per hour, my firm's unadjusted lodestar amounts to \$18,615.00.

11. My firm has incurred nominal costs that are waived.

12. Majarian Law Group, APC, as well as its attorneys and staff do not have any conflict of interest with any of the parties in this litigation.

I declare under the penalty of perjury under the laws of the State of California the foregoing is true and correct and this declaration is executed December 8, 2025 in Tarzana, California.

DocuSigned by:
Sahag Majarian

3142D9828E6E4A2

SAHAG MAJARIAN II

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

On the date indicated below, I served the document described as: **DECLARATION OF SAHAG MAJARIAN IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL 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:

Attorneys for Defendant TC CALIFORNIA HOSPITALITY LLC

[✓] **BY ELECTRONIC SERVICE:** Based on an agreement of the parties to accept 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.

Executed on December 11, 2025, at Glendale, California.

Signature