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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

BRANDYN SCOTTO and ANGEL
RODRIGUEZ, individually, and on behalf
of other members of the general public
similarly situated;

Plaintiffs,

v.

COVI CONCRETE CONSTRUCTION,
INC., a California corporation; and DOES
1 through 100, inclusive,

Defendants.

Case No.: 30-2023-01351136-CU-OE-CXC

**DECLARATION OF VARTAN MADOYAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Dept.: CX102
Judge: Layne H. Melzer

Date: September 11, 2025
Time: 2:00 p.m.
Reservation No. 74583065

Action Filed: September 26, 2023

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DECLARATION OF VARTAN MADOYAN

I, Vartan Madoyan, declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Brandyn Scotto (“Plaintiff Scotto”). The facts set forth in this declaration are within my personal knowledge or based on information and belief, and if called as a witness, I could and would competently testify thereto.

2. On September 26, 2023, Plaintiff Scotto filed a Class Action complaint in the Orange County Superior Court, Case No. 30-2023-01351136-CU-OE-CXC (“Scotto Action”), alleging claims for: (1) Violation of California Labor Code §§ 510 and 1198 (Unpaid Overtime); (2) Violation of California Labor Code §§ 226.7 and 512(a) (Unpaid Meal Period Premiums); (3) Violation of California Labor Code § 226.7 (Unpaid Rest Period Premiums); (4) Violation of California Labor Code §§ 1194, 1197, and 1197.1 (Unpaid Minimum Wages); (5) Violation of California Labor Code §§ 201 and 202 (Final Wages Not Timely Paid); (6) Violation of California Labor Code § 204 (Wages Not Timely Paid During Employment); (7) Violation of California Labor Code § 226(a) (Non-Compliant Wage Statements); (8) Violation of California Labor Code § 1174(d) (Failure To Keep Requisite Payroll Records); (9) Violation of California Labor Code §§ 2800 and 2802 (Unreimbursed Business Expenses); (10) Violation of California Business & Professions Code §§ 17200, et seq.

3. On November 20, 2024, the Parties participated in mediation presided over by Tripper Ortman, Esq., an experienced mediator of wage and hour class and PAGA actions. The Parties accepted a Mediator’s settlement proposal, which was subsequently memorialized in the form of a Memorandum of Understanding. Thereafter, the parties drafted and negotiated a long-form settlement agreement, which is the subject of the instant motion.

4. In addition to the above-referenced efforts, the Parties held numerous meetings and informal conferences prior to the mediation wherein information and theories of the cases and Defendant’s defenses were discussed. The Parties also submitted detailed mediation briefs, which outlined the Parties’ respective positions.

5. On March 26, 2025, for purposes of obtaining approval of the Parties’ global settlement of both the Scotto Action and Rodriguez Action, Plaintiff Scotto filed a First Amended Complaint in the

1 Scotto Action that added Rodriguez as a Plaintiff, and further adds Rodriguez's class and PAGA claims
2 against Defendant.

3 6. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
4 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
5 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is attorney
6 of record in dozens of employment-related putative class actions in both state and federal courts in the
7 State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex
8 wage-and-hour class and Private Attorneys General Act ("PAGA") representative actions. The firm has
9 successfully litigated cases involving nearly every aspect of California wage and hour law, including
10 payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for
11 same, timely payment of wages, provision of compliant wage statements, reimbursement of business
12 expenses, executive, administrative, and other overtime exemptions to the State of California and federal
13 overtime compensation requirements, PAGA claims, and sister statutes under federal law. Lawyers *for*
14 Justice, PC has recovered (sometimes in association with other law firms) millions of dollars on behalf of
15 thousands of individuals in California. Below is a summary of the experience and qualifications of
16 attorneys at Lawyers *for* Justice, PC (additional staff have also worked on the matter).

17 7. Edwin Aiwarzian is the Managing Member and Shareholder of Lawyers *for* Justice, PC.
18 He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris
19 Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal
20 education and training in dispute resolution and negotiation from the Straus Institute for Dispute
21 Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously
22 served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained
23 a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he
24 studied Legal Writing at Harvard University. From approximately September 2002 to approximately
25 December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United
26 States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August
27 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal
28 for the Second Appellate District. In December of 2004, he obtained a license to practice law from the

1 California State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he
2 has almost exclusively focused on the prosecution of consumer and employment class actions. While
3 employed by Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended
4 over one hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and
5 attended over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and
6 in some cases in conjunction with co-counsel, he has successfully litigated cases involving the executive,
7 administrative, and other overtime exemptions to the State of California and federal overtime
8 compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained
9 class certification by contested motion practice in approximately fifteen (15) cases in the last decade and
10 litigated over 1,000 class action or representative action cases.

11 8. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He received his
12 Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He
13 earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007
14 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the
15 California Court of Appeal for the Second Appellate District. From approximately August 2008 to
16 approximately December 2008, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw
17 of the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California
18 in 2010. He is admitted to practice before all courts of the State of California and all United States District
19 Courts in the State of California. He has worked on many wage-and-hour class action and representative
20 action cases, taking the lead in taking and defending depositions, arguing motions, and attending
21 mediations. He has played an integral role in preparing matters for class certification, including and not
22 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court
23 Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.
24 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No.
25 RG13680477). Under his supervision, dozens of class action or representative cases have resulted in
26 settlements that have been granted court approval, including and not limited to, those listed in paragraph
27 11 herein. He has handled over one hundred and fifty (150) mediations and worked on over two hundred
28 and fifty (250) class action or representative action cases which have resulted in settlement.

1 9. Joanna Ghosh is a Senior Member of Lawyers *for* Justice, PC. She received a Bachelor
2 of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from
3 the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law
4 Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013) and
5 is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the
6 Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of
7 depositions and successfully handled motion practice in class action cases regarding discovery (including
8 and not limited to, regarding class contact information), class certification (both contested class
9 certification and stipulated class certification), arbitration agreements, coordination, and intervention. She
10 has successfully handled briefing and oral argument on appeal and obtained notable decisions regarding
11 the Private Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v.*
12 *Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24,
13 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. She has
14 significant experience with class actions, including and not limited to working on cases to obtain class
15 certification through contested motion practice and working on cases in the post-certification stage (e.g.,
16 post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in
17 conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600
18 individuals). She also has extensive experience with class action and/or representative action settlements
19 and has handled this process in over three hundred (300) cases. Under her, Edwin Aiwazian, and Arby
20 Aiwazian's supervision, the firm has handled the class certification and court approval process for
21 hundreds of class action and/or representative action matters that have successfully resolved. She is a
22 member of the California Employment Lawyers Association.

23 10. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree in
24 Economics from the University of California, San Diego in 2007, and a Juris Doctor degree from Loyola
25 Law School in 2011, graduating with Cum Laude and Order of the Coif honors. I am admitted to practice
26 before all courts in the State of California and all U.S. District Courts in California. I externed for the
27 Honorable Victoria S. Kaufman of the United States Bankruptcy Court, Central District of California,
28 from June 2009 to August 2009. I externed for the Honorable Gary A. Feess of the United States District

1 Court, Central District of California, from January 2010 to May 2010. From 2011 through and including
2 the present, I have practiced almost exclusively on complex wage and hour class action and PAGA action
3 matters in California. From October 2011 to June 2013, I was an Associate at Littler Mendelson's Century
4 City, California office, working for one of the largest employer-side labor and employment law firms in
5 the United States. From July 2013 to March 2014, I was an Associate at Sheppard, Mullin, Richter &
6 Hampton's Century City, California office. From March 2014 to July 2023, I worked as an Associate and
7 then as Counsel at Baker Hostetler LLP's Los Angeles office. From August 2023 to the present, I have
8 been a Member of Lawyers *for* Justice, PC. I have taken and defended dozens of depositions and have
9 successfully handled motion practice in class action and PAGA cases regarding discovery (including and
10 not limited to motions regarding class contact information), class certification (both contested class
11 certification and stipulated class certification), dispositive motions, arbitration agreements, coordination,
12 and intervention. I have successfully handled a complex wage and hour class action and PAGA case
13 through a trial verdict in the matter of *Estrada v. Royalty Carpet Mills*, Orange County Superior Court,
14 Case No. 30-2013 00692890. I have also successfully handled briefing on appeal regarding employer
15 efforts to compel arbitration. *TitleMax of Cal. v. Pena*, California Court of Appeals for the Fifth District,
16 Case No. F084706 (Cal. Ct. App. March 28, 2023) (unpublished decision). Further, I have extensive
17 experience with settlements of class actions and PAGA actions and have handled and supervised this
18 process in over one hundred (100) cases.

19 11. What follows are just a few examples of the type of results Lawyers *for* Justice, PC
20 ("LFJ") has achieved on behalf of its clients:

21 a) LFJ, in association with co-counsel therein, represented the plaintiffs in a
22 wage-and-hour class action against a major property management company involving allegations
23 of misclassification of various "manager" positions. On September 20, 2010, the court granted
24 final approval of the class action settlement. The Los Angeles County Superior Court Case
25 Number is BC400414.

26 b) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class action against a national retailer of household items involving allegations of
28 misclassification of the "Assistant Store Manager" position. On October 28, 2010, the court

1 granted final approval of the class action settlement. The Los Angeles County Superior Court
2 Case Number is BC413498.

3 c) LFJ, in association with co-counsel therein, represented the plaintiffs in a
4 wage-and-hour class action against a national property management company involving
5 allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court
6 granted final approval of the class action settlement. The Los Angeles County Superior Court
7 Case Number is BC430918.

8 d) LFJ, in association with co-counsel therein, represented the plaintiffs in a
9 wage-and-hour class action against a national retailer involving allegations of misclassification of
10 the “Store Manager” position. On June 10, 2011, the court granted plaintiffs’ motion for class
11 certification. On August 26, 2013, the court granted final approval of the class action settlement.
12 The Los Angeles County Superior Court Case Number is BC424012.

13 e) LFJ, in association with co-counsel therein, represented the plaintiff in a
14 wage-and-hour class and PAGA representative action against a bank, involving allegations of
15 misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court
16 granted final approval of the class and PAGA representative action settlement. The Kern County
17 Superior Court Case Number is S-1500-CV-273194-LHB.

18 f) LFJ, in association with co-counsel therein, represented the plaintiff in a
19 wage-and-hour class and PAGA representative action against a national wholesale distributor of
20 plumbing and builder supplies, involving allegations of misclassification of multiple salaried
21 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA
22 representative action settlement. The Sacramento County Superior Court Case Number is 34-
23 2012-00136285.

24 g) LFJ, in association with co-counsel therein, represented the plaintiff in a
25 wage-and-hour class action against a multinational corporation that provides global workplace
26 solutions, involving allegations of misclassification of the “Operations Manager” position. On
27 September 16, 2014, the court granted plaintiff’s motion for class certification. The Los Angeles
28 County Superior Court Case Number is BC478769.

1 h) LFJ, in association with co-counsel therein, represented the plaintiff in a
2 wage-and-hour class and PAGA representative action against a national retailer of household
3 items, on behalf of hourly-paid or non-exempt employees. On May 27, 2015, the court granted
4 final approval of the class and PAGA representative action settlement. The San Francisco County
5 Superior Court Case Number is CGC-13-532344.

6 i) LFJ, in association with co-counsel therein, represented the plaintiff in a
7 wage-and-hour class and PAGA representative action involving allegations of misclassification of
8 the salaried residential “Property Manager” position. On September 17, 2015, the court granted
9 plaintiff’s motion for class certification. On October 20, 2017, the court granted final approval of
10 the class and PAGA representative action settlement. The Los Angeles County Superior Court
11 Case Number is BC474784.

12 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a
13 wage-and-hour class and PAGA representative action against a national retailer of upscale
14 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the court
15 granted final approval of the class and PAGA representative action settlement. The Los Angeles
16 County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial Council
17 Coordination Proceeding Number is 4794.

18 k) LFJ, in association with co-counsel therein, represented the plaintiffs in a
19 wage-and-hour class action against a national retailer of apparel and fashion accessories, on behalf
20 of non-exempt employees. On August 5, 2016, the court granted final approval of the class action
21 settlement. The Los Angeles County Superior Court Case Number is BC488069.

22 l) LFJ, in association with co-counsel therein, represented the plaintiffs in a
23 wage-and-hour class action against a national retailer of apparel, accessories, and home products,
24 involving allegations of misclassification of the “Department Manager” position. On August 12,
25 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class. On
26 August 6, 2019, the court granted final approval of the class action settlement. The Alameda
27 County Superior Court Case Number is RG13680477.

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1 m) LFJ represented the plaintiff in a PAGA representative action against a real
2 estate and property management company, on behalf of non-exempt employees. On November 4,
3 2016, the court granted approval of the PAGA representative action settlement. The Orange
4 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

5 n) LFJ, in association with co-counsel therein, represented the plaintiffs in a
6 wage-and-hour class and PAGA representative action against a full-service bank, on behalf of non-
7 exempt employees. On November 18, 2016, the court granted final approval of the class and PAGA
8 representative action settlement. The San Francisco County Superior Court Case Number is CJC-
9 13-004839 and the Judicial Council Coordination Proceeding Number is 4839.

10 o) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
11 representative action against a foodservice distributor, on behalf of non-exempt employees. On
12 January 26, 2017, the court granted final approval of the class and PAGA representative action
13 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

14 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative
15 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to the
16 employer's motion to compel arbitration, which resulted in a published opinion by the California
17 Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall Supply* (Cal.
18 App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, review denied, cert. denied (U.S. Supreme Court
19 Docket No. 17-254). The Riverside County Superior Court Case Numbers are RIC1503952 and
20 RICJCCP5046, and the Judicial Council Coordination Proceeding Number is 5046.

21 q) LFJ, in association with co-counsel therein, represented the plaintiffs in a
22 wage-and-hour class and PAGA representative action against a consumer packaging company, on
23 behalf of non-exempt employees. On March 10, 2017, the court granted final approval of the class
24 and PAGA representative action settlement. The Los Angeles County Superior Court Case
25 Number is BC590429.

26 r) LFJ, in association with co-counsel therein, represented the plaintiffs in a
27 wage-and-hour class and PAGA representative action against a manufacturer of food service
28 industry supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final

1 approval of the class and PAGA representative action settlement. The Orange County Superior
2 Court Case Number is 30-2015-00810013-CU-OE-CXC.

3 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a
4 wage-and-hour class and PAGA representative action against a lumber and hardware company on
5 behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the class
6 and PAGA representative action settlement. The Orange County Superior Court Case Number is
7 30-2014-00747750-CU-OE-CXC.

8 t) LFJ represented the plaintiff in a wage-and-hour class and PAGA
9 representative action against a property management company, on behalf of non-exempt
10 employees. On June 14, 2017, the court granted final approval of the class and PAGA
11 representative action settlement. The Los Angeles County Superior Court Case Number is
12 BC586234.

13 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA
14 representative action against a food company on behalf of non-exempt employees. On June 30,
15 2017, the court granted final approval of the class and PAGA representative action settlement. The
16 Sacramento County Superior Court Case Number is 34-2015-00175871.

17 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
18 representative action against a chocolate company on behalf of non-exempt employees. On July
19 19, 2017, the court granted final approval of the class and PAGA representative action settlement.
20 The Alameda County Superior Court Case Number is RG15764300.

21 w) LFJ represented the plaintiff in a PAGA representative action, against the
22 parent company of several restaurants, on behalf of hourly-paid, non-exempt employees. On
23 October 18, 2017, the court granted approval of the PAGA representative action settlement. The
24 Los Angeles County Superior Court Case Number is BC569664.

25 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
26 representative action against a manufacturer of plastic containers on behalf of non-exempt
27 employees. On October 31, 2017, the court granted final approval of the class and PAGA
28

1 representative action settlement. The Los Angeles County Superior Court Case Number is
2 BC577233.

3 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a
4 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
5 employees. On December 11, 2017, the court granted final approval of the class and PAGA
6 representative action settlement. The Los Angeles County Superior Court Case Number is
7 BC569646.

8 z) LFJ, in association with co-counsel therein, represented the plaintiffs in a
9 wage-and-hour class and PAGA representative action against a property management company on
10 behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court granted final
11 approval of the class and PAGA representative action settlement. The Los Angeles County
12 Superior Court Case Number is JCCP4819 and the Judicial Council Coordination Proceeding
13 Number is 4819.

14 aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a
15 wage-and-hour class and PAGA representative action against a global provider of flexible office
16 space solutions. On February 15, 2018, the court granted final approval of the class and PAGA
17 representative action settlement. The Los Angeles County Superior Court Case Number is
18 BC498401.

19 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a
20 wage-and-hour class action against a container manufacturer, on behalf of non-exempt employees.
21 On October 15, 2018, the court granted the plaintiff's motion for class certification. The Tulare
22 County Superior Court Case Number is VCU264528.

23 cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA
24 representative action against a behavioral health service provider on behalf of non-exempt
25 employees. On November 13, 2018, the court granted final approval of the class and PAGA
26 representative action settlement. The Alameda County Superior Court Case Number is
27 RG16811450.

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1 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a
2 PAGA representative action against a global provider of products and services to the energy
3 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court
4 granted approval of the PAGA representative action settlement. The Kern County Superior Court
5 Case Number is S-1500-CV-280215-SDC.

6 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a
7 wage-and-hour class action against a parking company on behalf of non-exempt employees. On
8 September 3, 2019, the court granted the plaintiff's motion for class certification and certified a
9 class. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial
10 Council Coordination Proceeding Number is 4886.

11 ff) LFJ, in association with co-counsel therein, represents the plaintiffs in a
12 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt
13 employees. On September 27, 2019, the court granted the plaintiffs' motion for class certification
14 in part and certified a class. The Alameda County Superior Court Case Number is RG15757606
15 and the Judicial Council Coordination Proceeding Number is 4921.

16 gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a
17 wage-and-hour class and PAGA representative action against a national retailer of apparel and
18 fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted
19 the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the
20 court granted final approval of the class and PAGA representative action settlement. The
21 Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

22 hh) LFJ, in association with co-counsel therein, represents the plaintiff in a
23 wage-and-hour class and PAGA representative action against a medical equipment supplier on
24 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion
25 for class certification and certified a class. The San Bernardino County Superior Court Case
26 Number is CIVDS1505744.

27 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
28 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed

1 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a
2 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,
3 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted approval
4 of the PAGA representative action settlement. The San Diego County Superior Court Case
5 Number is 34-2015-00175330.

6 jj) LFJ, in association with co-counsel therein, represents the plaintiff in a
7 wage-and-hour class and PAGA representative action against a large national drug testing
8 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the
9 plaintiff's motion for class certification and certified a class. The San Diego County Superior
10 Court Case Number is 37-2018-00019611-CU-OE-CTL.

11 kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a
12 wage-and-hour class and PAGA representative action against a national retailer of sportswear,
13 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020, the
14 court granted in part the plaintiff's motion for class certification and certified a class. The
15 Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the
16 Judicial Council Coordination Proceeding Number is 4930.

17 ll) LFJ, in association with co-counsel therein, represents the plaintiffs in a
18 wage-and-hour class action against manufacturer and supplier of power products and services on
19 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion
20 for class certification and certified a class. The San Diego County Superior Court Case Number is
21 37-2015-00025968-CU-OE-CTL.

22 mm) LFJ represents the plaintiff in a wage-and-hour class action against a
23 nutritional products manufacturer on behalf of non-exempt production line employees. On
24 December 13, 2021, the court granted the plaintiff's motion for class certification in part and
25 certified a class. The Solano County Superior Court Case Number is FCS051001.

26 11. Several attorneys at Lawyers *for* Justice, PC have worked on this case since its inception.
27 Our work with Zakay Law Group, JCL Law Firm, APC, and Moon Law Group, P.C., in the pursuit of
28 Plaintiffs' actions has been a coordinated and combined effort.

12. I believe that the settlement with Defendants for the consideration and on the terms set forth in the Settlement Agreement is fair, reasonable, adequate and is in the best interest of the Class in light of all known risks, facts and circumstances. These risks include: the risk of significant delay in class members receiving any type of funds; risks associated with contested class certification law and motion practice; the defenses asserted by Defendant, including that Defendant's policies and practices complied with California law and the matters at issue will require individualized issues that make class certification inappropriate, and the potential for prolonged appeal.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed on June 9, 2025, in Glendale, California.

Karen S. Olson

Vartan Madoyan