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Attorneys for Defendants
R AND T OIL INCORPORATED, RAFI
BARTANIYAN, and THOMAS VARTANIAN

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF RIVERSIDE – RIVERSIDE HISTORIC COURTHOUSE

ARLENE APODACA, on behalf of herself and
all others similarly situated, and the general
public, and as an “Aggrieved Employee” on
behalf of other “Aggrieved Employees” and the
State of California under the Private Attorneys
General Act of 2004

Plaintiff(s),

v.

R AND T OIL INCORPORATED, a California
corporation; RAFI BARTANIYAN, an
individual; THOMAS VARTANIAN, an
individual; and DOES 1-50, inclusive,

Defendant(s).

CASE NO. CVRI2402196

**DECLARATION OF GARABET O.
KHAJADOURIAN RE SETTLEMENT**

DECLARATION OF GARABET O. KHAJADOURIAN

I, GARABET O. KHAJADOURIAN, declare as follows:

I am an attorney at law admitted to practice before all the courts of the State of California,
an attorney with Briggs & Alexander, a Professional Corporation and counsel to Defendants R AND
T OIL INCORPORATED, RAFI BARTANIYAN, and THOMAS VARTANIAN (hereinafter
collectively “Defendants”). I am readily familiar with the files, documents, and papers in connection
with this litigation. The following facts are true of my own personal knowledge and, if called upon to
testify, I could and would testify as follows:

1. The parties hereto have reached an agreement as to the material terms of a class-wide
settlement (“Settlement”) and that once approved by this Court will resolve this action in its entirety.

1 2. Currently, I am not aware of any class, representative, or other collective action in any
2 other court in this or any other jurisdiction that asserts claims similar to those asserted in this action
3 on behalf of a class or group of individuals some or all of whom would also be members of the class
4 defined in this action.

5 3. Accordingly, I am not aware of any other pending matter or action asserting claims
6 that will be extinguished or adversely affected by the Settlement.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing
8 is true and correct and that I executed this Declaration on September 17, 2026 in Newport Beach,
9 California.

10 By: _____

Garabet O. Khajadourian