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Attorneys for Plaintiff

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

ROBERTO HERNANDEZ, individually, and
on behalf of other members of the general
public similarly situated, and as an aggrieved
employee and Private Attorney General;

Plaintiff,

vs.

ADAMS GRAIN CO., a California
corporation; ADAMS VEGETABLE OILS,
INC., a California corporation; and DOES 1
through 100, inclusive,

Defendants.

Case No. CV2022-1642

**DECLARATION OF YASMIN HOSSEINI
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: February 13, 2025

Time: 9:00 a.m.

Department: CX-101

Complaint Filed: September 27, 2022

Trial Date: None Set

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I, Yasmin Hosseini, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of the State Bar of California, the California Lawyers Association, and the Los Angeles County Bar Association. I am a member of the law firm of *for Justice, PC*, attorneys of record for Plaintiff Roberto Hernandez (“Plaintiff”) in the above-captioned action. The facts set forth in this declaration are within my personal knowledge or based on information received from reliable sources, and, if called as a witness, I could and would competently testify thereto.

EXPERIENCE AND ADEQUACY OF LAWYERS *for* JUSTICE, PC

EDUCATION

2. Since October 2008, Lawyers *for* Justice, PC has almost exclusively focused on the litigation of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is a party of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating wage-and-hour class and Private Attorneys General Act (“PAGA”) representative actions. The firm has successfully litigated cases involving the executive, administrative, and other overtime compensation provisions to the State of California and federal overtime compensation requirements. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars in damages for half of thousands of individuals in California.

3. Edwin Aiwasian is the Managing Member and Shareholder of Lawyers *for* Justice, PC. He earned his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of the Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono law clerk for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Management Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Theory at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served

1 as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second
2 Appellate District. In December of 2004, he obtained a license to practice law from the California State
3 Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost
4 exclusively focused on the prosecution of consumer and employment class actions. While employed by
5 Lawyers *for* Justice PC, he has argued over one hundred (100) motions, taken or defended over one
6 hundred fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended
7 over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in many
8 cases in conjunction with co-counsel, he has successfully litigated cases involving the executive,
9 administrative, and other overtime exemptions to the State of California and federal overtime
10 compensation requirements. Under his supervision, Lawyers *for* Justice, PC has successfully obtained
11 class certification by contested motion practice in approximately fifteen (15) cases in the last decade and
12 litigated over 1,000 class action or representative action cases.

13 4. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He received his
14 Bachelor of Arts degree from University of California, Los Angeles and graduated magna cum laude. He
15 earned a Juris Doctor degree, cum laude, from Southwestern Law School. From approximately May 2007
16 to approximately July 2007, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the
17 California Court of Appeal for the Second Appellate District. From approximately August 2008 to
18 approximately December 2008 he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of
19 the United State Court of Appeals for the Ninth Circuit. He was admitted to practice law in California in
20 2010. He is admitted to practice before all courts of the State of California and all United States District
21 Courts in the State of California. He has worked on many wage-and-hour class action and representative
22 action cases, taking the lead in taking and defending depositions, arguing motions, and attending
23 mediations. He has played an integral role in preparing matters for class certification, including and not
24 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court
25 Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.
26 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No.
27 RG13680477). He has worked on over one hundred (100) class action or representative action cases
28 which have resulted in settlement, including and not limited to those listed in paragraph 7 herein.

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

18 6. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree from
19 University of California, Santa Barbara in 2013 and earned my Juris Doctor degree from Pepperdine
20 University School of Law in 2017. I was admitted to practice law in California in 2019. I am admitted
21 to practice before all courts of the State of California and all federal district courts in the State of
22 California. I have worked on many wage and hour class action and PAGA representative matters, and my
23 work has included, *inter alia*, researching and drafting pleadings, administrative notice exhaustion,
24 drafting, negotiating, and finalizing stipulations and settlement agreements, engaging in motion practice,
25 claims evaluation and analysis, and making court appearances. Prior to working at Lawyers *for* Justice,
26 PC, I was an attorney at a prominent boutique entertainment law firm, where I represented filmmakers
27 and talent, negotiating and structuring various types of agreements on their behalf. I am a member of the
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California Employment Lawyers Association, Beverly Hills Bar Association, and Iranian American Bar Association.

EXAMPLES OF RESULTS IN WAGE-AND-HOUR CLASS ACTION AND REPRESENTATIVE ACTION CASES

What follows are just a few examples of the type of results Lawyers *for* Justice, PC (“LFJ”) has achieved on behalf of its clients:

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

b) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class action against a national retailer of household items involving allegations of misclassification of the “Assistant Store Manager” position. On October 28, 2010, the court granted final approval of the class action settlement. The Los Angeles County Superior Court Case Number is BC413498.

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

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

e) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-hour class and PAGA representative action against a bank, involving allegations of misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court granted final approval of the

1 class and PAGA representative action settlement. The Kern County Superior Court Case Number is S-
2 1500-CV-273194-LHB.

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

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

13 h) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-
14 hour class and PAGA representative action against a national retailer of household items, on behalf of
15 hourly-paid or non-exempt employees. On May 27, 2015, the court granted final approval of the class and
16 PAGA representative action settlement. The San Francisco County Superior Court Case Number is CGC-
17 13-532344.

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

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

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

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

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

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

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

24 p) LFJ, on behalf of the plaintiff and respondent in a PAGA representative action,
25 successfully opposed in the trial court, and briefed and argued an appeal with respect to the employer’s
26 motion to compel arbitration, which resulted in a published opinion by the California Court of Appeal in
27 favor of employees. *Roberto Betancourt v. Prudential Overall Supply* (Cal. App. 4th Dist., Mar. 7, 2017)
28 9 Cal.App.5th 439, review denied, cert. denied (U.S. Supreme Court Docket No. 17-254). The Riverside

County Superior Court Case Numbers are RIC1503952 and RICJCCP5046, and the Judicial Council Coordination Proceeding Number is 5046.

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

r) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-and-hour class and PAGA representative action against a manufacturer of food service industry supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final approval of the class and PAGA representative action settlement. The Orange County Superior Court Case Number is 30-2015-00810013-CU-OE-CXC.

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

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

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

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

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

5 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA representative
6 action against a manufacturer of plastic containers on behalf of non-exempt employees. On October 31,
7 2017, the court granted final approval of the class and PAGA representative action settlement. The Los
8 Angeles County Superior Court Case Number is BC577233.

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

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

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

22 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a wage-and-
23 hour class action against a container manufacturer, on behalf of non-exempt employees. On October 15,
24 2018, the court granted the plaintiff's motion for class certification. The Tulare County Superior Court
25 Case Number is VCU264528.

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

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

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

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

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

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

1 ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and
2 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed and
3 argued an appeal with respect to the employer's motion to compel arbitration, resulting in a notable
4 decision from the California Supreme Court clarifying the law and finding, in part, that employer
5 arbitration agreements are unenforceable where they block a PAGA claim from proceeding, *ZB, N.A. v.*
6 *Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted approval of the PAGA
7 representative action settlement. The San Diego County Superior Court Case Number is 34-2015-
8 00175330.

9 jj) LFJ, in association with co-counsel therein, represented the plaintiff in a wage-and-
10 hour class and PAGA representative action against a large national drug testing laboratory on behalf of
11 non-exempt employees. On February 21, 2020, the court granted the plaintiff's motion for class
12 certification and certified a class. On October 28, 2022, the court granted final approval of the class and
13 PAGA representative action settlement. The San Diego County Superior Court Case Number is 37-2018-
14 00019611-CU-OE-CTL.

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

21 ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a wage-
22 and-hour class action against manufacturer and supplier of power products and services on behalf of non-
23 exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion for class certification
24 and certified a class. On August 27, 2021, the court granted final approval of the class action settlement.
25 The San Diego County Superior Court Case Number is 37-2015-00025968-CU-OE-CTL.

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

3 nn) LFJ represents the plaintiff in a wage-and-hour class action against an iconic
4 lifestyle accessories brand and retailer on behalf of non-exempt employees. On March 15, 2022, the court
5 granted the plaintiff's motion for class certification in part and certified a class. The San Francisco
6 Superior Court Case Number is CGC-16-550794.

7 oo) LFJ represents the plaintiffs in a wage-and-hour class action against a manufacturer
8 and distributor of commercial dish and glass cleaning machines and supplies for the restaurant and
9 hospitality industries, on behalf of hourly-paid or non-exempt employees. On July 13, 2023, the court
10 granted plaintiffs' motion for class certification and certified a class. The Los Angeles County Superior
11 Court Case Number is BC707670.

12 **SUMMARY OF WORK PERFORMED**

13 7. Lawyers *for* Justice, PC has been actively engaged in the litigation of this matter since from
14 the inception of the above-captioned action, which was commenced on September 27, 2022, entitled
15 *Roberto Hernandez v. Adams Grain Co., et al.*, Orange County Superior Court Case No. 30-2024-
16 01376148-CU-OE-CXC ("Action"). Lawyers *for* Justice, PC has fully and actively participated in the
17 litigation process throughout the pendency of this matter, and since joining forces with and associating
18 the attorneys at Protection Law Group, LLP as co-counsel, we have worked cooperatively with them to
19 strategize and prosecute the case, and our work with them has been a coordinated and combined effort.
20 Together, Lawyers *for* Justice, PC and Protection Law Group, LLP are referred to as "Class Counsel."

21 8. Before initiating the lawsuit on behalf of Plaintiff, Lawyers *for* Justice, PC conducted
22 extensive investigation and research into the facts and circumstances underlying the pertinent factual and
23 legal issues and applicable law. This required thorough discussions and interviews between attorneys at
24 our firm and Plaintiff, and research into the various legal issues involved in the case, namely, the current
25 state of the law as it applied to class certification, off-the-clock theory, meal and rest periods, wage-and-
26 hour enforcement, Plaintiff's claims and damages, and Defendants' defenses. After conducting initial
27 investigation, our firm determined that Plaintiff's claims were well-suited for class action treatment and
28 representative adjudication owing to what appeared to be a common course of conduct affecting a

1 similarly situated group of current and former hourly-paid, non-exempt employees who worked for
2 Defendants Adams Grain Co. and Adams Vegetable Oils, Inc. (together, “Defendants”) within the State
3 of California, who were not properly compensated for, *inter alia*, all hours worked, non-compliant meal
4 and rest periods, and unreimbursed business expenses.

5 9. Collectively, Class Counsel investigated the veracity, strength, and scope of the claims,
6 and worked on preparing the case for class certification and trial, prior to reaching the Settlement. This
7 matter has involved extensive and ongoing investigations, research into legal and factual issues, formal
8 and informal discovery, and court proceedings. Class Counsel obtained information, documents, and data
9 in the course of litigation and in connection with mediation and settlement negotiations. Class Counsel
10 reviewed and analyzed a volume of information, documents, and data obtained from Plaintiff, Defendants,
11 and other sources, researched applicable law, and undertook analyses and calculations of the value of
12 claims, damages, and penalties exposure. Class Counsel also met and conferred with Defendants’ counsel
13 on numerous occasions, e.g., to discuss issues relating to the pleadings, case management, production of
14 information, documents, and data in the course of litigation and mediation and settlement negotiations,
15 and mediation and settlement negotiations. Other work that Class Counsel has performed includes, and
16 is not limited to, case strategy and analysis; drafting, reviewing, and revising the pleadings and motion-
17 related papers; claims assessment and evaluation; and preparing for and attending mediation and
18 settlement negotiations.

19 10. As outlined herein, the parties have conducted significant investigations and exchange,
20 review, and analysis of a volume of information, documents, and data obtained from Plaintiff, Defendants,
21 and other sources during the course of litigating the case and in connection with mediation and settlement
22 negotiations. This information, documents, and data provided a critical understanding of the nature of the
23 work performed by putative class members and aggrieved employees, as well as Defendants’ operations
24 and employment policies, practices, and procedures, and were used in analyzing liability, damages, and
25 penalties valuation issues in connection with all phases of the litigation, and ultimately, in connection with
26 the mediation and settlement negotiation process. Accordingly, sufficient investigation and review of
27 information has taken place in order for the parties to be sufficiently informed of the nature and extent of
28 the claims, and to enable all parties to fully evaluate the Settlement for its fairness, adequacy, and

1 reasonableness.

2 11. After conducting significant investigation of the facts and law during the prosecution of
3 the case, counsel for the parties engaged in mediation and extensive settlement negotiations to try to
4 resolve the case. These efforts included participating in mediation conducted by Marc Feder, Esq., a well-
5 regarded mediator who is experienced in mediating complex labor and employment matters, on March
6 12, 2024. During all settlement discussions, the parties conducted their negotiations at arm's length in an
7 adversarial position. In the course of mediation and settlement negotiations, the parties discussed and
8 considered all aspects of the case, including the risks and delays of further litigation, the risks to the parties
9 of proceeding with class certification, and/or trial, the law relating to class certification, off-the-clock
10 theory, meal and rest periods, PAGA representative claims, and wage-and-hour enforcement, as well as
11 the evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at a
12 settlement that was acceptable to the parties was not easy. After conducting extensive investigations and
13 settlement negotiations, and with the aid of the mediator's evaluation, the parties have agreed to resolve
14 the case given the legal issues relating to Plaintiff's principal claims, as well as the costs and risks to both
15 sides that would attend further litigation, and the real possibility of no recovery after years of litigation.

16 12. The Settlement provides for an Enhancement Award in an amount not to exceed Seven
17 Thousand Five Hundred Dollars and Zero Cents (\$7,500.00) for Plaintiff. The contemplated enhancement
18 award is fair and appropriate in light of the time and effort that Plaintiff expended to pursue the case.
19 Plaintiff was available whenever Class Counsel needed him, actively tried to obtain and provide
20 information, and spent a substantial amount of time and effort providing the facts and evidence necessary
21 to facilitate prosecution of the case. Accordingly, it is appropriate and just for Plaintiff to receive a
22 reasonable enhancement award for his services in the case, in addition to his individual settlement payment
23 under the Settlement.

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1 13. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement
2 is in the best interests of Plaintiff, other Class Members, the State of California, and PAGA Members.

3 I declare under penalty of perjury under the laws of the State of California that the foregoing is
4 true and correct.

5 Executed on this 8th day of January 2025, at Glendale, California.

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8 Yasmin Hosseini
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