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ARSINEH TOPALIANFARD, and MIKI APODACA

Additional Counsel listed on following page

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

JOANNA GOSLIN, ELIZABETH HALL,
NARINE MADATYAN, ARSINEH
TOPALIANFARD, and MIKI APODACA,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

vs.

TARLANI CORP., a California
corporation; MARGARITA TALANIAN, a
natural person; ARTHUR TALANIAN, a
natural person; MILLENNIUM
HEALTHCARE SERVICES, INC.;
ALLIANCE HEALTH SERVICES, INC., a
California corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No. 24STCV168890

Lead Case No. 24STCV11142

Judge: Hon. Timothy Patrick Dillon

**DECLARATION OF ROMAN SHKODNIK
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF THE
CLASS AND REPRESENTATIVE ACTION
SETTLEMENT**

Date: July 16, 2026

Time: 10:00 a.m.

Dept.: 15

1 BENOWITZ LAW CORPORATION
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7 Attorneys for Plaintiffs JOANNA GOSLIN and
8 ELIZABETH HALL

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1 **QUALIFICATIONS AND ADEQUACY OF CLASS COUNSEL**

2 6. My firm is well qualified because of our experience, knowledge, and resources to act as
3 counsel and represent Plaintiffs and the putative class in this action. My practice is exclusively
4 focused on employment matters, with a substantial percentage devoted to litigating wage, hour,
5 and working-conditions violations on a class-wide basis.

6 7. I received my Bachelor of Arts in history and political science from the University of
7 California, Los Angeles, in 2007. I then earned my Juris Doctorate from Loyola Law School in
8 May of 2011. Upon graduating from law school, I have exclusively focused my practice on
9 representing employees including in wage-and-hour class actions.

10 8. I have been practicing law since 2012. Since 2013, I have focused almost exclusively
11 on representing employees, including in wage-and-hour class actions. During my career I have
12 represented employees in over 100 wage-and-hour class action lawsuits as lead or co-lead counsel
13 (including in the Central, Southern, Eastern and Northern Districts of California), and I have
14 obtained six and seven figure settlements against a range of defendants, including Fortune 500
15 companies. These cases have involved the gamut of wage-and-hour claims, including claims for
16 failure to pay minimum wages, unpaid wages and overtime, inaccurate pay statements, and failure
17 to pay timely wages - similar to claims at issue in the present matter.

18 9. I am experienced in prosecuting employment matters, particularly class actions. In
19 addition to the present case, I am also class counsel for dozens of other putative wage-and-hour
20 class-action lawsuits pending in various state and federal jurisdictions throughout California.

21 10. My extensive experience in litigating employment wage and hour matters has been
22 integral in identifying legal issues, evaluating the strengths and weaknesses of a case, and
23 generally negotiating fair and reasonable class action settlements. Practice in the narrow field of
24 wage and hour litigation requires skill and knowledge concerning the constantly evolving
25 substantive law (state and federal), as well as the procedural law of class action litigation. In this
26 action, I am fully equipped to use the skills and knowledge I have developed through more than a
27 decade of prosecuting and defending wage and hour class actions to fairly and adequately
28 represent the interests of the Class. Therefore, on the account of my resources, experience, and

1 knowledge, I am well qualified to act as Class Counsel and represent Plaintiffs and the putative
2 Class Members in this action.

3 11. Owing to my experience, I am well qualified to evaluate the class claims in this action,
4 to evaluate settlement v. trial and defenses raised. The following are examples of some of my
5 cases that have resulted in favorable settlements for the employee Class Members and Aggrieved
6 Employees I have represented: (a) *Bogues v. Ikes place #6*, San Diego Superior Court, Case No.
7 37-2020-00023727-CU-OE-CTL (Hon. Robert Longstreth); (b) *Garcia v. Statewide Traffic Safety*
8 *And Signs, Inc.*, Orange County Superior Court, Case No. 30-2018-01011814-CU-OE-CXC
9 (Hon. Lon F. Hurwitz); (c) *Brito v. Brothers International Desserts dba Brothers International*
10 *Desserts Inc.*, Orange County Superior Court, Case No. 30-2022-01242515-CU-OE-CXC (Hon.
11 William D. Claster); (d) *Valenzuela v. Best Express Foods, Inc.*, San Joaquin County Superior
12 Court, Case No. STK-CV-UOE-2021-4131 (Hon. Robert T. Waters); (e) *Ruem v. EMTS, Inc. et*
13 *al.*, Fresno County Superior Court, Case No. 18CECG04441 (Hon. Kimberly Gaab); (f) *Quizon v.*
14 *CF Watsonville East, LLC.*, Santa Cruz County Superior Court, Case No. 20CV01868 (Hon. Paul
15 Marigonda); (g) *Cesena v. JYM Enterprises, Inc.*, Los Angeles Superior Court, Case No.
16 21STCV27949 (Hon. Monica Bachner); (h) *In re Mobileone Wage And Hour Cases*, San Mateo
17 Superior Court, Case No. JCCP 5039 (Hon. Marie S. Weiner); (i) *Ly v. Prime Comms Retail,*
18 *LLC*, Sacramento County Superior Court, Case No. 34-2020-00281668 (Hon. Christopher E.
19 Krueger); (j) *Savattieri et al. v. AMI Expeditionary Healthcare et al.*, Los Angeles County
20 Superior Court, Case No. 21STCV33372 (Hon. Kenneth R. Freeman).

21 12. For purposes of this motion, the “Class” or “Class Members” means all non-exempt
22 individuals that worked for Defendants in California during the Class Period on an hourly or
23 piece-rate basis. I do not believe that I have any conflicts of interest with the Class or with the
24 Class Representatives. I am not related to the Class Representatives. I have not previously
25 represented Defendants in any matter. I respectfully submit that I, and D.Law, Inc. are well suited
26 to act as Class Counsel in this action, and we have and will continue to vigorously represent the
27 interests of the Class Members.

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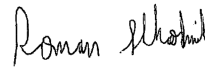
1 **SETTLEMENT IS FAIR, REASONABLE, AND ADEQUATE**

2 13. Based on Class Counsel's knowledge and expertise in class action litigation, Class
3 Counsel believes this Settlement will provide a substantial benefit to the Class Members.

4 14. From Class Counsel's review of the facts, strengths, and weaknesses of the case, the
5 risks and delays posed by further litigation, and Class Counsel's own prior litigation experience,
6 Class Counsel believes that the recovery for each class member is fair, reasonable, and adequate
7 taking into consideration the amounts received in other wage and hour class actions; the risks
8 inherent in litigation of this genre, including numerous potential appellate issues; and the
9 reasonable tailoring of each Class Member's claim to the settlement award he or she will receive.
10 Class Counsel is aware of the burdens of proof necessary to establish liability for the claims
11 asserted in the Action and the difficulties in establishing damages for Class Members. Further, the
12 settlement negotiations were extensive and conducted in good faith and at arm's length between
13 attorneys with substantial experience litigating class actions and wage and hour cases, the
14 Settlement Agreement was the product of a non-collusive settlement process in which the Parties
15 were forced to make significant compromises in the interest of reaching a full and complete
16 settlement of the lawsuit.

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

19 Executed this 24th of April 2026, at Pasadena, California.

20 

21 _____
Roman Shkodnik

PROOF OF SERVICE

State of California,
County of Los Angeles

1. I am a citizen of the United States and am employed in the County of Los Angeles, State of California. I am over the age of 18 years, and not a party to the within action. My business address is 8605 Santa Monica Boulevard, PMB 79183, West Hollywood, CA 90069.
2. On April 25, 2026, I served the foregoing document(s) described as **DECLARATION OF ROMAN SHKODNIK IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** on interested parties by transmitting it in the manner(s) described below:

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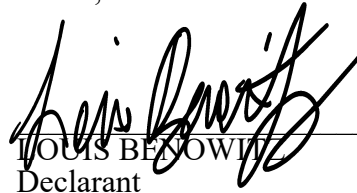
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XXXX BY EMAIL I transmitted a PDF version of this document by electronic mail to the person(s) indicated using the email address(es) indicated.

XXXX (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

EXECUTED on April 25, 2026, at Manhattan Beach, California.



LOUIS BENOWITZ
Declarant