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Attorneys for Plaintiff Kristian Dodson, on behalf of herself and other aggrieved employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES

KRISTIAN DODSON, on behalf of herself and other aggrieved employees,

Plaintiff,

vs.

LA MIRADA POST ACUTE LLC, a California Limited Liability Company; SUN MAR REHABILITATION SERVICES, LLC, a California Limited Liability Company; SUN MAR MANAGEMENT SERVICES, a California Corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No. 24STCV11019
ASSIGNED FOR ALL PURPOSES TO:
The Honorable Richard L. Fruin
Department 307

REPRESENTATIVE ACTION

DECLARATION OF JOSEPH M. HEKMAT IN SUPPORT OF MOTION FOR APPROVAL OF PRIVATE ATTORNEYS GENERAL ACT ("PAGA") SETTLEMENT

Date:	November 17, 2026
Time:	9:15 a.m.
Dept:	307
Judge:	Hon. Richard L. Fruin
Reservation:	014615751961

Complaint filed:	May 1, 2024
Trial date:	Not Set

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DECLARATION OF JOSEPH M. HEKMAT

I, Joseph M. Hekmat, declare as follows:

1. I am an attorney duly licensed to practice law before all courts in the State of California. I am the Managing Attorney of Hekmat Law Group, and co-counsel for Plaintiff Kristian Dodson ("Plaintiff Dodson") in this action. I have personal knowledge of the facts set forth herein and, if called and sworn in as a witness, could and would testify competently thereto.

2. I submit this declaration in support of Plaintiff's Unopposed Motion for Approval of Private Attorneys General Act Settlement.

Experience of Counsel

3. I have been a licensed attorney in California since 2009. I am a graduate of the University of California, Irvine (B.A. 2004) and Loyola Law School (J.D. 2009), where I served as Chief Articles Editor for the International and Comparative Law Review and extern to the Honorable Ronald S. W. Lew, United States District Court, Central District of California. Upon graduating law school, I joined the litigation group of Glaser Weil Fink Howard Avchen & Shapiro LLP and subsequently worked as general counsel of Evergreen Financial Holdings, LLC, where a significant portion of my practice was devoted to employment litigation. I founded the Hekmat Law Group in 2013 and have since almost exclusively represented employees and consumers in individual and class action matters. I am a member of the California Employment Lawyers Association ("CELA") and the Consumer Attorneys Association of Los Angeles ("CAALA").

4. I have been appointed Class Counsel in the following cases: *Rodriguez v. Hawk II Environmental Corp.,* Case No. BC625121, California Superior Court, County of Los Angeles, Honorable Judge John Shepard Wiley, Jr., presiding (approving an hourly rate of $620.16 for work performed in 2016 and 2017); *Francisco v. Emeritus Corp.* et al, Case No. CV 17-02871 VAP (SSx), United States District Court, Central District of California, Honorable Judge Virginia A. Phillips, presiding (approving an hourly rate of $671.82 for work performed in 2016 through 2019); *Macrae v. Yummy Foods, LLC,* Case No. BC679159,

California Superior Court, County of Los Angeles, Honorable Amy D. Hogue, presiding (approving an hourly rate of $671.82 for work performed in 2017 through 2019); *Victor Contreras v. Letter Ride, LLC,* Case No. 37-2018-00020841-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Eddie C. Sturgeon, presiding; *Sandra Muniz, et al vs. Sutter Valley Hospitals,* Case No. 34-2017-00209151-CU-OE-GDS, California Superior Court, County of Sacramento, Honorable Lauri A. Damrell, presiding (approving an hourly rate of $815 for work performed in 2016 through 2023).

5. Additionally, I served as PAGA Counsel in the following non-class action PAGA cases: *Stephanie Bautista, et al v. Four Season Healthcare and Wellness,* Case No. BC612483, California Superior Court, County of Los Angeles, Honorable Holly E. Kendig, presiding; *Angelique Stefan v. Fast Auto Loans, Inc.,* Case No. BC701265, California Superior Court, County of Los Angeles, Honorable Michael L. Stern, presiding; *Sheila Gibbons v. Coastal Health Care, Inc. et al;* Case No. 19STCV17817, California Superior Court, County of Los Angeles, Honorable Mark A. Young, presiding; *Magda Castro v. Ross Dress for Less, Inc.,* Case No. BCV-21-101490, California Superior Court, County of Kern, Honorable Gregory Pulskamp, presiding. *Rubyann Mondragon v. Santa Ana Healthcare & Wellness Centre, LP, et al,* Case No. 19STCV26878, California Superior Court, County of Los Angeles, Honorable Rupert A. Byrdsong, presiding (approving an hourly rate of $845 for work performed from 2019 through 2025); *Marlon De Leon, et al v. Haidilao Hot Pot Century City, Inc. et al,* Case No. 23STCV08293, California Superior Court, County of Los Angeles, Honorable Tiana J. Murillo, presiding (approving an hourly rate of $845 for work performed from 2023 through 2025).

6. In 2019, Thomson Reuters recognized me as a "Rising Star" in the Southern California edition of the annual Super Lawyer directory. It is my understanding that this is an honor awarded to no more than two and a half percent of attorneys under the age of forty (or who have practiced for ten years or less) in Southern California each year. I have subsequently been recognized as a "Super Lawyer" from 2020 through 2026.

7. I believe that my professional experience renders me more than qualified to serve as PAGA counsel in this lawsuit involving claims of underpaid overtime and minimum

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wages, meal and rest period violations, and derivative penalty claims. Not only have I litigated dozens of wage and hour cases throughout my career involving similar claims, including the wage and hour class actions identified above, I have litigated similar claims from both plaintiff and defense perspectives. As a result, I am able to realistically assess and evaluate the facts and legal arguments that can be made in pursuit and defense of similar wage and hour claims, as well as those facts and arguments in support and in opposition to class certification. Consequently, I am able to appreciate the significant risks, uncertainties, and delay involved in wage and hour class action litigation.

8. My co-counsel in this matter are the attorneys at Cohelan Khoury & Singer. Their qualifications are listed in their respective declarations filed herewith.

9. I believe that my co-counsel and I are well qualified to be PAGA Counsel in this matter because of our experience, knowledge and resources to act as counsel and represent the Plaintiff and PAGA Members in this action. A substantial percentage of each firm's practice is devoted to litigating wage and hour class and PAGA only actions, and we have obtained favorable results in many such cases against a range of defendants, including a variety of large companies.

10. My firm, along with co-counsel, entered into a fee split agreement that was approved by Plaintiff.

Settlement

11. This is a wage and hour PAGA action brought by Plaintiff against Defendants La Mirada Post Acute LLC, Sun Mar Rehabilitation Services, LLC, and Sun Mar Management Services ("La Mirada" or "Defendants").

12. As co-counsel for Plaintiff, I have been intimately involved in every aspect of this case from its inception through the present, and I believe that the proposed Settlement is a favorable result for the PAGA Members under the circumstances presented.

13. This matter was filed in 2024 and ultimately resolved after mediation. The details of the litigation history are laid out in the concurrently filed Declaration of Jeff Geraci.

14. I believe the proposed settlement is a favorable result for the PAGA Members in light of all the known facts and circumstances, including the substantial amounts that PAGA

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Members are estimated to receive, the expenses and risk inherent in continued litigation, the potential maximum value of the Plaintiff's claims, Defendant's defenses, Defendant's financial condition, the potential recovery to PAGA Members if the action were litigated through trial, and the probability of any recovery for PAGA Members being delayed in the event of a successful trial outcome by the taking of an appeal. Furthermore, should this case continue to be litigated, it is unlikely that many PAGA Members would bring individual claims. Indeed, in my opinion that the terms and conditions embodied in the Settlement are more than fair, reasonable, and adequate, especially when judged against the risks of continued litigation.

Attorneys' Fees and Costs

15. I have spent over 36 hours working on this case to date and expect to spend at least several more hours working on briefs, appearing at hearings, speaking with PAGA members, etc. My hourly rate is $875/hour. Consequently, my total lodestar, without applying any multiplier is $31,500.00. The time records accurately, yet conservatively, represent the time productively and necessarily spent in the prosecution of this case. My firm's out of pocket costs for this matter total $145.33.

16. My firm took this case on a contingent basis against a business represented by reputable counsel and advanced costs. When we take contingent cases, we must pay careful attention to the economics involved. We must anticipate that we shall, if successful, receive a fee that exceeds our normal hourly rate; otherwise, the risk is often too great to bear. Indeed, as a solo practitioner, my firm can only take on a limited amount of matters at a time. Even when we work long hours, the number of hours in a day is limited. Because of this, when we take on one particular matter, we are unable to take on other matters.

17. As discussed in the Memorandum of Points and Authorities in Support of the Motion, the attorneys at the Hekmat Law Group, P.C. and Cohelan Khoury & Singer — collectively, PAGA Counsel—seek $75,000 in attorneys' fees.

Plaintiff's Enhancement

18. An enhancement award of $10,000 is reasonable and appropriate in this matter for Ms. Dodson, as it will fairly compensate her for the work she did in securing this

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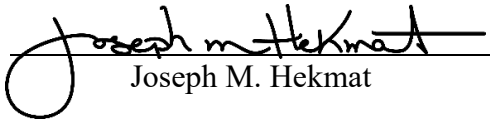
settlement, as well as compensate her for any employment-related backlash she may suffer in the future on account of her filing a representative action lawsuit against one of her former employers.

19. Ms. Dodson has contributed to this action by agreeing to be a PAGA representative, reviewing the complaint, staying in contact with current and past PAGA members, responding to counsel's e-mails and phone calls and providing documents related to her employment and relevant to the case. Ms. Dodson spent many hours collaborating with counsel, being educated on the legal issues and keeping up-to-date on all matters relevant to this case, all of which ultimately resulted in a favorable settlement for the PAGA Members.

20. This enhancement award is a small percentage-of the total settlement amount, and is particularly appropriate in this instance in light of the fact that potential employers who search for Ms. Dodson's name online will find, or have found, the instant matter—and may refuse to hire her because of it. Ms. Dodson separately files her declaration in support of her request for this reasonable enhancement award.

21. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 25, 2026, at Los Angeles, California.



Joseph M. Hekmat

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