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[Additional Counsel on Following Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ALAMEDA

YULISSA MEDINA, on behalf of herself
and “aggrieved” employees pursuant to
Labor Code section 2698, et seq.,

Plaintiff,

vs.

24 HOUR FITNESS USA, LLC., a
California limited liability company; and
DOES 1-10, inclusive.

Defendants.

Case No. 24CV089740

Assigned to Hon. Mark Fickes, Dept. 518

**DECLARATION OF ROMAN SHKODNIK IN
SUPPORT OF UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

DATE: March 5, 2026

TIME: 2:30 p.m.

DEPT.: 518

Reservation ID: 233298411480

Action Filed: August 30, 2024

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22 Attorneys for Plaintiff Bruno Cruz

1 I, ROMAN SHKODNIK, hereby declare and state as follows:

2 1. I am an attorney licensed and admitted to practice before all courts of the State of
3 California, the United States District Court for the Central, Southern, Eastern, and Northern
4 Districts of California, and the Ninth Circuit Court of Appeals. I am a senior attorney at D.Law,
5 Inc., counsel for Plaintiff Bruno Cruz ("Plaintiff") on behalf of himself and similarly situated
6 employees of Defendant 24 Hour Fitness USA, LLC ("Defendant" collectively with Plaintiff, "the
7 Parties"). I and my firm are referred to herein as Class Counsel. I have personal knowledge of the
8 facts herein and if called as a witness, I could and would competently testify.

9 2. All of the matters set forth herein are within my personal knowledge, except those
10 matters that are stated to be upon information and belief. As to such matters, I believe them to be
11 true. I have represented Plaintiff and the putative Class since the inception of this matter. I submit
12 this Declaration in support of the Motion for Preliminary Approval, filed by Plaintiff, on behalf of
13 himself and other similarly situated employees of Defendant, and without opposition from
14 Defendant, for preliminary approval of the Parties' Settlement of Class Action and the Private
15 Attorney General Act ("PAGA") Representative Action ("Settlement Agreement" or
16 "Settlement").

17 **Education and Experience:**

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

22 4. My firm is well qualified because of our experience, knowledge, and resources to
23 act as counsel and represent Plaintiff and the Aggrieved Employees in this action. A substantial
24 percentage of our practice is devoted to litigating wage, hour, and working-conditions violations,
25 and the bulk of these cases are class and PAGA actions.

26 5. I am experienced in prosecuting employment matters, particularly class and
27 representative PAGA actions. In addition to the present case, I am also class or PAGA counsel for
28 other wage-and-hour class-action lawsuits pending in various counties throughout California

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

6. In sum, Plaintiff's Counsel is experienced in employment class and PAGA action litigation and is adequate to represent the Settlement Class in the instant action.

Factual and Procedural Background:

7. On November 4, 2024, Plaintiff Bruno Cruz exhausted the pre-filing requirements of the PAGA. On November 4, 2024, Bruno Cruz filed a Class Action Complaint against Defendant 24 Hour Fitness USA, LLC in the California Superior Court, County of San Bernardino, captioned *Bruno Cruz v. 24 Hour Fitness, USA, LLC, San Bernardino County Superior Court*, Case No. CIVSB2433321 (the "*Cruz Action*"). The Class Action Complaint in *Cruz* alleges class claims on behalf of all of Defendant's current and former non-exempt employees in California based on: (1) failure to pay minimum wages; (2) failure to pay wages and overtime; (3) non-compliant meal-breaks; (4) non-compliant rest-breaks; (5) failure to pay vacation wages; (6)

1 failure to provide paid sick time; (7) failure to reimburse for necessary expenditures; (8) failure to
2 provide accurate itemized wage statements; (9) failure to keep required payroll records; (10)
3 failure to pay final wages at termination; (11) and violation of Business and Professions Code.

4 8. On November 4, 2024, Cruz served a PAGA Notice with the LWDA.

5 9. On January 8, 2025, the plaintiff in *Cruz* filed a First Amended Class Action
6 Complaint that adds a cause of action for civil penalties pursuant to the PAGA on behalf of
7 himself, the state of California, and Defendant's non-exempt employees in California based on the
8 same underlying alleged Labor Code violations.

9 **The Settlement:**

10 10. When the costs and risks of non-certification and loss on the merits are considered,
11 Plaintiff's counsel is of the opinion that the settlement reached is clearly a favorable one.

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

14 Executed this 9th day of February 2026, at Glendale, California.

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18 Roman Shkodnik
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