

John G. Yslas (SBN 187324)
john.yslas@wilshirelawfirm.com
Eugene Zinovyev (SBN 267245)
eugene.zinovyev@wilshirelawfirm.com
John Brown (SBN 233605)
john.brown@wilshirelawfirm.com
Courtney M. Miller (SBN 327850)
courtney.miller@wilshirelawfirm.com
Gabriella Solé (SBN 346164)
gabriella.sole@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
660 S. Figueroa Street, Sky Lobby
Los Angeles, California 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff

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

MARICELA HERNANDEZ ROJAS,
individually, and on behalf of all others similarly
situated,

Plaintiff,

v.

AMGEN, INC., a Delaware corporation; and
DOES 1 through 10, inclusive,

Defendants.

Case No.: 2024CUOE025580

*[Assigned for All Purposes to the Hon.
Charmaine H. Buehner, Dept. J4]*

**DECLARATION OF JOHN G. YSLAS IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Final Approval Hearing:

Date: September 12, 2025

Time: 8:20 a.m.

Dept.: J4

DECLARATION OF JOHN G. YSLAS

I, John G. Yslas, declare as follows:

1. I am an attorney at law licensed to practice before all of the courts of the State of California. I am a Senior Partner at Wilshire Law Firm, PLC (“WLF”), counsel of record for Plaintiff Maricela Hernandez Rojas (“Plaintiff”). I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

2. I submit this declaration in support of Plaintiff’s Motion for Final Approval of Class Action and PAGA Settlement.

3. Plaintiff is represented by WLF. The attorneys at WLF performed significant work and expended litigation costs in prosecuting this matter with no guarantee of payment.

4. WLF was selected by Best Lawyers and U.S. News & World Report as one of the nation’s Best Law Firms since 2020 and is comprised of more than 100 attorneys and over 600 employees. WLF is actively and continuously practicing in employment litigation, representing employees in both individual and class actions in both state and federal courts throughout California.

5. WLF is qualified to handle this litigation because its attorneys are experienced in litigating Labor Code violations in individual, class action, and representative action cases. WLF has handled, and is currently handling, numerous wage and hour class action lawsuits, as well as class actions involving consumer rights and data privacy litigation.

6. I graduated from the University of California, Santa Barbara with High Honors in 1991 with Bachelor of Arts degrees in Psychology. I received my Juris Doctor from UCLA Law School in 1996.

7. Upon graduating from law school in 1996, I worked for a boutique law firm practicing general litigation which included employment law matters. Since 2000 (that is, the last 25 years) my practice has been exclusively focused on labor and employment matters including handling wage and hour class, collective and representative actions (including the

1 California Private Attorneys General Act, or “PAGA”), including in the international law firms
2 of Morgan, Lewis & Bockius LLP (where I was a senior associate), Foley & Lardner LLP
3 (where I was a partner and a national Vice Chair of the Labor and Employment Group), Norton
4 Rose Fulbright LLP (where I was a partner) and Seyfarth Shaw LLP (where I was a partner and
5 member of the Wage and Hour Practice Group). During my time at these law firms, I was the
6 primary attorney or took a major leading role in defending employers on numerous wage and
7 hour class, collective and representative actions.

8 8. In late June 2022, I left Seyfarth Shaw LLP and joined my current firm, Wilshire
9 Law Firm, PLC, to represent plaintiff employees. I have been and am handling many wage and
10 hour class and representative actions litigating such matters on behalf of plaintiff employees in
11 numerous Superior Courts and District Courts. From matters representing both plaintiffs and
12 defendants, I have successfully mediated the resolution of many wage and hour class,
13 collective, and representative actions. Since starting to settle cases in late April 2023, I have
14 already successfully mediated matters in which I have been counsel or co-counsel resulting in
15 **over \$148 million** in settlements and verdicts which are in the process of being finalized, and
16 with numerous upcoming mediations scheduled. In those and numerous other matters, I have
17 managed and assisted with the litigation and settlement of many wage and hour PAGA and
18 class actions. In those actions, I performed similar tasks as those performed in the course of
19 prosecuting this action. Indeed, I recently tried and prevailed in achieving a jury verdict for
20 more than \$6.3 million in a wage and hour class action in the matter of *Aguilar-Flores v.*
21 *Javier’s – CC LLC*, Los Angeles County Superior Court, Case No. 19STCV36438, (additional
22 PAGA damages may be awarded and a motion for attorney’s fees will be filed in the near
23 future).

24 9. I have received numerous awards for my legal work. For example, from 2015 to
25 2018, I was listed in Los Angeles Super Lawyers for Employment Litigation (Thomson
26 Reuters). I have also served on numerous prominent boards and in other leadership positions,
27 including serving as Southern California Regional President for the Hispanic National Bar
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1 Association and on the board of directors of the Mexican American Bar Foundation. I also
2 previously served on the 5-member Los Angeles Civil Service Commission, which generally
3 oversees the personnel decisions for the City of Los Angeles.

4 10. I have also published numerous blogs on labor and employment issues including
5 on wage and hour issues. For example, I published “Headline News: Wal-Mart v. Dukes-
6 Impact on Class Action Litigation” (while a partner with Foley & Lardner LLP) and “Are You
7 Really Protected From Wage-and-Hour Successor Liability in an Asset Purchase” (while a
8 partner with Seyfarth Shaw LLP). I have also been a presenter at numerous conferences,
9 including being a presenter involving the “Employment Law Update” at a National
10 Employment Law Council conference. My hourly billing rate is \$1,500.00.

11 11. Samantha A. Smith was a Senior Attorney at WLF where her practice was
12 focused on managing wage and hour class action and PAGA settlements. Ms. Smith was
13 admitted to the California Bar in December of 2004, and received a J.D. from University of
14 California, Hastings College of the Law and a B.A. from University of California, Davis. Ms.
15 Smith has dedicated her 21-year career to plaintiffs’-side class action litigation. Her wealth of
16 experience includes successful work on all stages of class action litigation, including class
17 action appeals, class certification motions, and class settlements. *See, e.g., Blue Diamond*
18 *Growers Product Labeling Cases*, JCCP No. 4822 (Los Angeles County Superior Court) (false
19 advertising of Blue Diamond food products); *Adam vs. eHealth, Inc.*, Case No. 17CV309050
20 (Santa Clara County Superior Court) (employee data breach); *Overton v. Armour-Eckrich*
21 *Meats, LLC*, Case No. CIVDS1501325 (San Bernardino County Superior Court) (unpaid
22 wages, meal period and rest break claims, and PAGA violations for non-exempt employees);
23 *DeLeon et al. v. Westlake Services, LLC*, Case No. BC 526750 (Los Angeles County Superior
24 Court) (unpaid overtime, meal period and rest break claims for call center employees); *Sawyer*
25 *v. Retail Data, LLC*, Case No. 30-2014-00753767-CU-OE-CXC (Orange County Superior
26 Court) (unpaid wage and rest break claims for piece rate workers); *Nguyen v. Pharmerica*
27 *Corporation et al.*, Case No. 30-2014-00716072-CU-OE-CXC (Orange County Superior
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1 Court) (unpaid wages and unreimbursed expenses for pharmacists); *Laumea v. Performance*
2 *Food Group, Inc.*, Case No. CIVDS1407509 (San Bernardino County Superior Court) (unpaid
3 wages, meal and rest break claims for non-exempt employees); *Durroh v. East West Bank*, Case
4 No. BC528860 (Los Angeles County Superior Court) (overtime claims for failure to include
5 bonuses in regular rate of pay for bank workers); *Gonzalez et al. v. SFFI Company, Inc. et al.*,
6 Case No. CIVDS1504287 (San Bernardino County Superior Court) (unpaid wages, meal period
7 and rest break claims for non-exempt employees). Ms. Smith's hourly billing rate is \$1,000.00.

8 12. Eugene Zinovyev ("Mr. Zinovyev") is a Junior Partner at WLF. He graduated
9 from the University of California, Berkeley, with a Bachelor of Arts in Political Economy of
10 Industrial Societies, and received his Juris Doctor from the University of California, San
11 Francisco School of Law in 2009. He has since practiced employment and wage and hour law
12 on both the plaintiff and defense sides. Mr. Zinovyev has tried multiple jury cases to verdict as
13 well as numerous bench trials. He has also briefed published appellate court decisions in both
14 state and federal court. Mr. Zinovyev is admitted to practice before all Federal District Courts
15 in California as well as the 9th Circuit Court of Appeals. He is also a member of the California
16 Employment Lawyers Association. He has mediated and settled dozens of class and
17 representative actions as well as individual civil matters. Mr. Zinovyev's hourly billing rate is
18 \$900.00.

19 13. Courtney M. Miller ("Ms. Miller") is a Settlement Attorney at WLF. She was
20 admitted to practice law in the State of California in 2019. Ms. Miller graduated from the
21 University of California, Santa Cruz, with a Bachelor of Arts in Sociology. Prior to becoming
22 an attorney, Ms. Miller worked at a boutique civil litigation firm for nearly a decade, primarily
23 handling employment matters. She earned her Juris Doctor from Southwestern Law School in
24 2019. Ms. Miller has prosecuted wage and hour class and PAGA actions, almost exclusively,
25 since 2020. As a handling attorney, Ms. Miller obtained over \$30 million dollars in settlements
26 on behalf of California employees. Ms. Miller's hourly billing rate is \$650.00.

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1 14. Gabriella Solé (“Ms. Solé”) is a third-year Associate Attorney at Wilshire Law
2 Firm, PLC. She was admitted to practice law in the State of California in 2022. Gabriella
3 graduated from University of California, Los Angeles, with a Bachelor of Arts in Sociology.
4 She received her Juris Doctor from University of San Francisco, School of Law. During law
5 school, she was a First Year Moot Court Director on the Moot Court Board. Since graduating,
6 her practice has been mainly focused on wage and hour class action litigation. Ms. Solé’s
7 hourly billing rate is \$500.00.

8 15. Aram Boyadjian (“Mr. Boyadjian”) is an Associate Attorney at WLF. He was
9 admitted to practice law in the State of California in 2021. He graduated from the University
10 of California, Los Angeles, with a Bachelor of Arts in Political Science. Mr. Boyadjian received
11 his Juris Doctor from Loyola Law School. During law school, he was a member of the student
12 editorial board for the International and Comparative Law Review. Since January 2021, his
13 practice has mainly been focused on wage and hour class action litigation. Mr. Boyadjian’s
14 hourly billing rate is \$600.00.

15 16. WLF’s hourly rates are comparable to those charged by other class action
16 plaintiffs’ counsel and the firms defending class actions. WLF’s hourly rates have been
17 approved by other courts in California. *See, e.g., Matthew Veliz v. DrinkPak, LLC*, Los Angeles
18 County Superior Court, Case No. 22STCV37384, *Ismael Villegas-Sanchez v. COE Orchard*
19 *Equipment, Inc.*, Sutter County Superior Court, Case No. CVCS22-0002261; *Jessica Bronsal*
20 *v. PTI Technologies Inc.*, Ventura County Superior Court, Case No. 202200570361CUOE;
21 *Miguel A. Vigil Ruiz v. The De Ruosi Group, LLC*, San Joaquin County Superior Court, Case
22 No. STK-CV-UOE-2022-8780; *Gutierrez v. Top Drawer Merch, LLC et al*, Los Angeles
23 County Superior Court, Case No. 23STCV04299; *Wing v. Road Machinery, LLC et al*, Kern
24 County Superior Court, Case No. BCV-22-102896; *Hernandez v. SGPS Showrig Los Angeles,*
25 *Inc.*, Los Angeles County Superior Court, Case No. 22STCV28155; *Azevedo v. Tulare Nursing*
26 *& Rehabilitation Hospital, Inc.*, Tulare County Superior Court, Case No. VCU293325; *Haser*
27 *v. Universal Chain of California, Inc.*, Sacramento County Superior Court, Case No. 34-2022-
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00332268; *Caldera v. Performance Online, Inc. et al*, Riverside County Superior Court, Case No. CVRI2306013; *Goosby v. CiminoCare, Inc.*, Sacramento County Superior Court, Case No. 34-2022-00329033; *Rooks v. Hot Cakes Restaurant Group, Inc.*, San Joaquin County Superior Court, Case No. STK-CV-UOE-2022-11056; *Garcia v. Compassionate Heart*, Orange County Superior Court, Case No. 30-2022-01294409-CU-OE-CXC; *Parra v. Citrus Valley Management Services, Inc.*, Riverside County Superior Court, Case No. CVRI2301768; *Torres v. HomeShield Pest Control Inc.*, Placer County Superior Court, Case No. S-CV-0049525; *Cabrera v. Creekside Auto Group*, Santa Clara County Superior Court, Case No. 23CV415661; *Simpson v. Arcos*, Riverside Superior Court, Case No. CVRI2303337; *Payne v. Planned Parenthood: Shasta-Diablo, Inc.*, San Francisco County Superior Court, Case No. CGC-23-607359. The total hours expended on this action are reasonable and in line with comparable cases.

17. WLF has performed significant work and incurred litigation costs in prosecuting this matter with no guarantee of any payment. The efforts expended by Plaintiff's counsel to achieve this result include, but are not limited to, the following:

a. the investigation of the matter, including meeting with Plaintiff, reviewing Defendant's policies, and requesting and reviewing Plaintiff's time and pay records, personnel files, and exploring the corporate structure of Defendant;

b. filing the lawsuit;

c. attending status conferences and meeting and conferring with Defendant regarding the case;

d. meeting and conferring with Defendant regarding mediation, exchanging of informal discovery beforehand, and negotiating with opposing counsel regarding the parameters thereof;

e. selecting a mediator and mediation date;

f. working with opposing counsel and expert consultants for the receipt of a representative sampling and analyzing the same with the aid of expert consultants and Plaintiff

1 to perform analyses of liability and exposure prior to attendance of the mediation in this matter;

2 g. reviewing policy documents from Defendant and researching applicable
3 defenses;

4 h. preparation of the mediation brief and damages model for use at mediation;

5 i. attendance at the mediation by all Parties and Counsel;

6 j. communicating with Plaintiff who requested updates or other information
7 regarding this matter;

8 k. negotiating, finalizing and fully executing the settlement agreement;

9 l. preparing and filing the Motion for Preliminary Approval and supporting
10 documents;

11 m. negotiating, finalizing and fully executing the amended settlement agreement;

12 n. attending hearings;

13 o. communicating with class members who sought additional information
14 regarding the settlement, including answering questions regarding the settlement and obtaining
15 updated addresses from class members for purposes of receiving the class notices and
16 administering the settlement checks; and

17 p. preparing the instant Motion for Final Approval and supporting documents.

18 18. WLF's current lodestar reflects the efficiencies achieved by attorneys
19 experienced in this field with **326.1** hours of work resulting in **\$336,880.00** in fees. WLF
20 dedicated significant resources to this case by dividing the tasks required according to skill
21 level. The hours expended by each attorney were not duplicative and reflect the extensive
22 investigation and analysis that was required to achieve this Settlement. This amount does not
23 include the time Class Counsel will spend at the final approval hearing and assisting the
24 Settlement Administrator following final approval. The chart below shows the calculation of
25 hours spent by each of WLF's attorneys on this case:

26 ///

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Attorney	Hours	Hourly Rate	Total
Aram Boyadjian	2.1	\$600.00	\$1,260.00
Courtney M. Miller	10.0	\$650.00	\$6,500.00
Samantha A. Smith	20.0	\$1,000.00	\$20,000.00
Eugene Zinovyev	60.8	\$900.00	\$54,720.00
Gabriella Solé	95.4	\$500.00	\$47,700.00
John G. Yslas	137.8	\$1,500.00	\$206,700.00
TOTAL	326.1		\$336,880.00

19. The risk factors present in this case favor the application of a 2.98 multiplier. To begin, Class Counsel singularly assumed the risk and costs of litigation purely on a contingency basis. And, while Plaintiff is confident in the merits of her claims, a legitimate controversy exists as to each cause of action posing an actual risk that Plaintiff may not succeed at class certification and/or trial. Any of these obstacles could have prevented recovery completely, meaning Class Counsel would have been left with no compensation for all the time and money invested in litigating this case. Despite these risks, Class Counsel took this case on a contingency basis so that Class Members (a particularly vulnerable group of hourly paid workers) could be compensated for their unpaid wages. Consequently, Class Counsel was precluded from focusing on, or taking on, other cases which could have resulted in a larger, and less risky, monetary gain. This time could have been spent on other potentially lucrative cases.

20. In litigation costs, WLF has incurred \$27,145.56 in costs for expenses such as filing fees, service fees, mediation fees, and expert fees. Since Class Counsel's costs do not exceed the maximum of \$30,000.00, the remaining \$2,854.44 will revert to the Net Settlement Amount. A true and correct copies of WLF's cost reports in this matter are attached hereto as **Exhibit 1**. All of the costs incurred were reasonable and necessary for the prosecution of this case.

1 21. Class Counsel has negotiated a settlement here that they believe is fair,
2 reasonable, and adequate based on their prior experience litigating these types of cases.

3 22. To date, the LWDA has not responded to or objected to the Settlement in this
4 matter.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct. Executed on August 20, 2025 at Los Angeles, California.

7 

8 _____
9 John G. Yslas

EXHIBIT 1

Expenses Subtotals - Filtered Exp. Type

As of 2025-08-14 09:37:27 Pacific Standard Time/PST • Generated by Jeanette Castillo-Luis

Filtered By
Show: All matters
Matter: ID equals a0LPc000001vBKp
Expense Type equals E127 — DTF,DTF,E108 — Postage,E102 — Printing

Display Name ↑	Expense Type ↑	Date	Expense: Expense ID	Provider Name	Note	Amount	Reduction Amount	Amount Paid	Amount Due.
Maricela Hernandez-Rojas - Wage & Hour: 1/12/2024	DTF	7/29/2024	E-3226040		Docusign envelope	\$1.89			\$1.89
	Subtotal	Sum				\$1.89	\$0.00	\$0.00	\$1.89
		Count	1						
	E108 — Postage	6/12/2024	E-3208912			\$7.60			\$7.60
		6/12/2024	E-3208909			\$7.60			\$7.60
		2/9/2024	E-3179306			\$7.36			\$7.36
		2/9/2024	E-3179305			\$7.36			\$7.36
		2/9/2024	E-3179304			\$7.36			\$7.36
	Subtotal	Sum				\$37.28	\$0.00	\$0.00	\$37.28
		Count	5						
Subtotal		Sum				\$39.17	\$0.00	\$0.00	\$39.17
		Count	6						
Total		Sum				\$39.17	\$0.00	\$0.00	\$39.17
		Count	6						

Wilshire Law Firm, PLC
Client Costs Detailed Report
All Transactions

	Type	Date	Num	Class	Source Name	Memo	Amount	Balance
500000 · COS								
501500 · Court Filing Fees								
	Credit Card Charge	01/15/2025		AmgenInc(Hernandez-R).W&H	File & ServeXpress	202410100250501 AmgenInc(Hernandez-R).W&H	79.70	79.70
	Bill	07/19/2024	78380	AmgenInc(Hernandez-R).W&H	Valpro Attorney Services, LLC	78380-AmgenInc(Hernandez-R).W&H-File notice of	1,185.00	1,264.70
	Credit Card Charge	06/12/2024	23023309	AmgenInc(Hernandez-R).W&H	One Legal LLC	23023309-250464-Atty Svc for Court Filing-Compl,S	597.11	1,861.81
	Credit Card Charge	06/13/2024	23023310	AmgenInc(Hernandez-R).W&H	One Legal LLC	23023310-250464-Atty Svc for Court Filing-Compl,S	41.18	1,902.99
	Credit Card Charge	06/19/2024	23122844	AmgenInc(Hernandez-R).W&H	One Legal LLC	23122844-250464-Atty Svc for Court Filing-POS-Am	92.66	1,995.65
	Credit Card Charge	06/25/2024	23140461	AmgenInc(Hernandez-R).W&H	One Legal LLC	23140461-250464-Atty Svc for Court Filing-Ntc of Hi	94.71	2,090.36
	Credit Card Charge	08/20/2024	23554494	AmgenInc(Hernandez-R).W&H	One Legal LLC	23554494-250464-Atty Svc for Court Filing-Compl,C	1,496.64	3,587.00
	Credit Card Charge	08/30/2024	23605411	AmgenInc(Hernandez-R).W&H	One Legal LLC	23605411-250464-Atty Svc for Court Filing-Appli for	81.07	3,668.07
	Credit Card Charge	10/07/2024	23810047	AmgenInc(Hernandez-R).W&H	One Legal LLC	23810047-250464-Atty Svc for Court Filing-Stip,Proq	236.96	3,905.03
	Credit Card Charge	10/15/2024	23890184	AmgenInc(Hernandez-R).W&H	One Legal LLC	23890184-250464-Atty Svc for Court Filing-Amende	98.09	4,003.12
	Credit Card Charge	10/08/2024	23890185	AmgenInc(Hernandez-R).W&H	One Legal LLC	23890185-250464-Atty Svc for Court Filing-Amende	5.16	4,008.28
	Credit Card Charge	04/17/2025	25171636	AmgenInc(Hernandez-R).W&H	One Legal LLC	25171636-250464-Atty Svc for Court Filing-Declar,P	86.94	4,095.22
	Bill	10/01/2024	202409100250501	AmgenInc(Hernandez-R).W&H	File & ServeXpress	202409100250501-AmgenInc(Hernandez-R).W&H-I	43.45	4,138.67
	Bill	10/31/2024	202410100250501	AmgenInc(Hernandez-R).W&H	File & ServeXpress	202410100250501-AmgenInc(Hernandez-R).W&H-	0.00	4,138.67
Total 501500 · Court Filing Fees							4,138.67	4,138.67
502500 · Legal Expenses								
	Credit Card Charge	06/17/2024		AmgenInc(Hernandez-R).W&H	Department of Industrial Relations	ORD-000291941 (250464) AmgenInc(Hernandez-R	75.00	75.00
	Bill	09/23/2024	(07/29/24)	AmgenInc(Hernandez-R).W&H	David Rotman - Mediated Negotiations	(07/29/24)-AmgenInc(Hernandez-R).W&H-50% Mec	13,250.00	13,325.00
	General Journal	10/03/2024	10.03.24	AmgenInc(Hernandez-R).W&H	250464 AmgenInc(Hernandez-R).W&H	11866586-AmgenInc(Hernandez-R).W&H-CourtCal	72.00	13,397.00
	General Journal	10/03/2024	10.03.24	AmgenInc(Hernandez-R).W&H	250464 AmgenInc(Hernandez-R).W&H	11866588-AmgenInc(Hernandez-R).W&H-CourtCal	72.00	13,469.00
	General Journal	11/22/2024	11.22.24	AmgenInc(Hernandez-R).W&H	240987 Deleon,Jessica I-04/01/23	11880282-AmgenInc(Hernandez-R).W&H-CourtCal	72.00	13,541.00
	General Journal	12/23/2024	12.23.24	AmgenInc(Hernandez-R).W&H	250464 AmgenInc(Hernandez-R).W&H	11866586-AmgenInc(Hernandez-R).W&H-CourtCal	-72.00	13,469.00
	General Journal	12/23/2024	12.23.24	AmgenInc(Hernandez-R).W&H	250464 AmgenInc(Hernandez-R).W&H	11866588-AmgenInc(Hernandez-R).W&H-CourtCal	-72.00	13,397.00
	General Journal	12/23/2024	12.23.24	AmgenInc(Hernandez-R).W&H	250464 AmgenInc(Hernandez-R).W&H	11880282-AmgenInc(Hernandez-R).W&H-CourtCal	-72.00	13,325.00
Total 502500 · Legal Expenses							13,325.00	13,325.00
503300 · Professional Fees								
	Bill	12/05/2024	13461	AmgenInc(Hernandez-R).W&H	Berger Consulting Group, LLC	13461 AmgenInc(Hernandez-R).W&H 17.50 hours c	9,680.00	9,680.00
Total 503300 · Professional Fees							9,680.00	9,680.00
Total 500000 · COS							27,143.67	27,143.67
TOTAL							27,143.67	27,143.67