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*Attorneys for Plaintiffs*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF RIVERSIDE**

FALCAO RIVELINO HERNANDEZ and  
SERGIO RODRIGUEZ NAVA, individually  
and on behalf of others similarly situated, and  
as aggrieved employees and Private Attorneys  
General,

Plaintiffs,

vs.

LDI MECHANICAL, INC., a Delaware  
corporation doing business in California; and  
DOES 1 through 50, inclusive,

Defendants.

Case No. CVRI2401542

*[Case assigned for all purposes to the  
Hon. Harold W. Hopp, Dept. I]*

**DECLARATION OF ADEN M.  
KHACHADORIAN IN SUPPORT  
OF PLAINTIFFS' MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS AND PAGA ACTION  
SETTLEMENT**

Date: September 8, 2025  
Time: 8:30 a.m.  
Dept.: 1

Action Filed: March 22, 2024  
Trial Date: None Set

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I, ADEN M. KHACHADOORIAN declare as follows:

1. I am an associate with Haines Law Group, APC, and co-counsel for the named Plaintiffs Falcao Rivelino Hernandez and Sergio Rodriguez Nava (“Plaintiffs”) in the above-captioned matter. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I received a Bachelor of Arts degree from the California State University of Northridge in 2017, and a Juris Doctor from Loyola Law School, Los Angeles, in 2022. I was admitted to the California State Bar in December 2022. During law school, I served as the Senior Production Editor for the Loyola of Los Angeles Entertainment Law Review and participated in the Loyola Center for Conflict Resolution's Conciliation and Mediation Assistance Clinic.

3. Prior to joining Haines Law Group, I was a law clerk for McNicholas & McNicholas, LLP, where I worked on mass tort litigation cases, including drafting memoranda on substantive litigation issues. Since August 2022, I have worked as an associate at Haines Law Group, APC.

4. Although non-exhaustive, the types of tasks I have performed include: conducting client intakes, drafting complaints, attending court hearings in state and federal administrative courts, corresponding with opposing counsel, drafting and responding to written discovery, drafting and opposing a variety of motions including motions for summary judgment, drafting mediation briefs, attending mandatory settlement conferences, drafting long-form settlement agreements, and drafting motions for preliminary and final settlement approval.

5. The following is a non-exhaustive list of the class action settlements in which I played a major role assisting Class Counsel, and which have been granted final approval: *Vicente Reyes v. Ruskin Company, et al.*, Riverside County Superior Court, Case No. RIC1902599; *Mel Del Consuelo Martinez v. K&S Foods Management, Inc.*, Los Angeles County Superior Court, Case No. 19STCV26488; *Julia Bojorquez v. JIPC Ventures, Inc., et al.*, San Diego County Superior Court, Case No. 37-2020-00029943-CU-OE-CTL; *Isalia Farias v. Ability Pathways*

1 *Incorporated, et al.*, Los Angeles County Superior Court, Case No. 19STCV22956; *Cristina*  
2 *Jimenez v. Hocking International Laboratories Incorporated*, San Diego County Superior Court,  
3 Case No. 37-2020-00001478-CU-OE-CTL; *Roberto Navarro v. Prime Converting Corporation*,  
4 San Bernardino County Superior Court, Case No. CIVSB2106868; *Cheryl Miller v. Mountain*  
5 *High Reunited, LLC*, San Bernardino County Superior Court, Case No. CIVDS2010045.

6         6.         The following is a non-exhaustive list of the class action settlements that I have  
7 played a major role assisting Class Counsel that have been granted final approval and in which  
8 attorney's fees have been granted following a lodestar cross-check based on the following rates:

9 *Davis Allen v. Creative Stone MFG. Inc.*, San Bernardino County Superior Court, Case No.  
10 CIVSB2201498 (awarding attorney's fees following a lodestar cross-check based on a rate of  
11 \$425 for work performed in 2022-2023); *Osman Ventura v. Kay & James, Inc., et al.*, Los Angeles  
12 County Superior Court, Case No. 19STCV25743 (awarding attorney's fees following a lodestar  
13 cross-check based on a rate of \$425 for work performed in 2022-2023); *Martha Lizaola v.*  
14 *Hawaiian Host Candies of L.A., Inc.*, Los Angeles County Superior Court, Case No.  
15 21STCV20136 (awarding attorney's fees following a lodestar cross-check based on a rate of \$400  
16 for work performed in 2022-2023); *Epigmenio Rivas Herrera v. O.W. Lee Inc.*, San Bernardino  
17 County Superior Court, Case No. CIVSB2109747 (awarding attorney's fees following a lodestar  
18 cross-check based on a rate of \$400 for work performed in 2022-2023); *Jayvin Jacobs v. RTI*  
19 *Systems, Inc.*, Los Angeles County Superior Court, Case No. 20STCV40907 (awarding attorney's  
20 fees following a lodestar cross-check based on a rate of \$400 for work performed in 2022-2024);  
21 *Marlon Viruete v. Jon K Takata Corporation*, Los Angeles County Superior Court, Case No.  
22 20STCV36412 (awarding attorney's fees following a lodestar cross-check based on a rate of \$400  
23 for work performed in 2022-2024); *Jose Cuellar v. Bee Imagine LLC*, Los Angeles County  
24 Superior Court, Case No. 21STCV07867 (awarding attorney's fees following a lodestar cross-  
25 check based on a rate of \$400 for work performed in 2022-2024); *Crescencio Cruz v. Holland*  
26 *America Flowers, LLC*, San Luis Obispo County Superior Court, Case No. 21CV-0620 (awarding  
27 attorney's fees following a lodestar cross-check based on a rate of \$400 for work performed in  
28 2022-2024); *Alfredo Salazar Meza v. Open Door Packaging, LLC, et al.*, San Bernardino County

1 Superior Court, Case No. CIVSB2200570 (awarding attorney's fees following a lodestar cross-  
2 check based on a rate of \$400 for work performed in 2022-2024); *Richard Soto v. Applied*  
3 *BioCode, Inc.*, Case No. 23STCV20199, Los Angeles County Superior Court, Honorable Laura  
4 A. Seigle, presiding (awarding attorneys' fees following a lodestar cross-check based on an hourly  
5 rate of \$425 for work performed in 2023-2025); *Miriam Moreno v. Beacon Day School, Inc.*, Case  
6 No. 30-2022-01296662-CU-OE-CXC, Orange County Superior Court, Honorable Lon F. Hurwitz,  
7 presiding (awarding attorneys' fees following a lodestar cross-check based on an hourly rate of  
8 \$425 for work performed in 2022-2025).

9 7. As counsel for Plaintiffs, I have been closely involved in all aspects of this  
10 litigation since its inception. The details of the work completed by Plaintiffs' Counsel in this case  
11 are set forth in the declaration of Matthew K. Moen, filed concurrently herewith.

12 8. I confirm that I do not have any interest or involvement in, and am not affiliated  
13 with, the proposed settlement administrator, Phoenix Settlement Administrators.

14 9. After conducting a reasonable inquiry, I am not aware of any class, representative  
15 or other collective action pending in any court that asserts claims similar to those in this action  
16 that could be extinguished or adversely affected by this Settlement.

17 I declare under penalty of perjury under the laws of the United States and the state of  
18 California that the foregoing is true and correct. Executed on August 7, 2025, at El Segundo,  
19 California.

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21 Aden M. Khachadorian  
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