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

SARAH ROBERTS-COOPER, as an
individual and on behalf of all others
similarly situated,

Plaintiff,

vs.

RISE LUXURY REHAB, LLC, a
Delaware limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 2024CUOE033989

[Assigned to the Hon. Charmaine H. Buehner,
Dept. 44]

**DECLARATION OF ELWINA GRIGORYAN
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS AND
REPRESENTATIVE ACTION SETTLEMENT**

Date: July 29, 2026

Time: 1:30 p.m.

Dept.: 44

Action Filed: December 4, 2024

Trial Date: None Set

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I, Elwina Grigoryan, declare as follows:

1. I am an attorney at law, duly licensed to practice before all courts in the State of California, and am with the law firm KACE LAW, APC, counsel of record for Plaintiff Sarah Roberts-Cooper (“Class Representative” or “Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. The proposed settlement meets the criteria for this Court to grant final approval of this matter on a class-wide basis, as the settlement is fair, adequate, and reasonable.

3. The Joint Stipulation of Class and Representative Action Settlement and the Amendment to Joint Stipulation of Class and Representative Action Settlement (together, the “Agreement” or “Settlement Agreement”) was the product of negotiation between highly able and experienced attorneys on both sides who possessed the relevant data and legal research which they had carefully analyzed. Class Counsel engaged in extensive factual investigation before settling, including exchanging informal discovery and sample of time and payroll records, reviewing class and PAGA data, and reviewing Defendant’s pertinent policies and practices relevant to valuing this case. Class Counsel also retained an expert to analyze the time and payroll records and conduct any extrapolation. This allowed Class Counsel to conduct a full damage analysis. The Parties also engaged in arm’s-length negotiations at mediation with the Hon. Lisa Cole (Ret.), which resulted in this settlement.

4. The settlement in the case at bar warrants approval and carries a presumption of fairness. As previously noted in the application for Preliminary Approval, this current settlement was negotiated at arm's length. I support the settlement as fair, reasonable, and adequate, and in the best interest of the Settlement Class Members as a whole.

5. Any remaining monies from uncashed settlement checks will be distributed to the *cy pres* recipient Legal Aid At Work. I do not have any relationship with Legal Aid At Work that would create an actual or potential conflict of interest. The Parties further agree that proposed *cy pres* recipient satisfies the legislative intent set out in Code of Civil Procedure § 384(a), in that the organization helps further the purposes of the underlying action and promote justice for all

1 Californians.

2 6. My qualifications are as follows: During law school, I was a law clerk at various
3 local law offices and the Federal Trade Commission. I also participated in Scott Moot Court. I
4 received my J.D. from Loyola Law School in 2017 and was admitted to the California Bar in
5 December 2017.

6 7. Following law school, I was a post-bar law clerk for Kabateck, Brown, and Kellner.
7 Thereafter, I was an associate at Law + Brandmeyer from 2018 through 2019, Wood Smith &
8 Henning from 2019 through 2020, Employee Justice Law Group from 2020 through 2021.

9 8. While at Law + Brandmeyer, I served as second chair at trial for the prevailing
10 defendant in a medical malpractice case.

11 9. While at Wood Smith & Henning, I represented a wide array of large companies in
12 employment litigation and class litigation in state court. I served as defense counsel in multiple
13 class action cases including *Parker v. Rimcock Villa, et al.* and *Barbara J Bowlin -Burdick v. Life*
14 *Care Centers of America*, (Los Angeles County Superior Court, Case No. BC657139).

15 10. While at Employee Justice Law Group, my practice was primarily in representing
16 employees in single plaintiff and multi plaintiff employment litigation.

17 11. In June 2021, I started KACE LAW, APC where I am the founding attorney. A
18 majority of my practice includes representing employees in single plaintiff lawsuits involving
19 claims under the California Fair Employment and Housing Act and the California Labor Code,
20 wage and hour class actions, and actions under the Private General Attorney Act.

21 12. My hourly rate is \$700.00 per hour. I have been approved at this rate in *Tubalinal v*
22 *Griffith Park Rehabilitation Center, LLC, et al.* (Los Angeles County Superior Court, Case No.
23 25STCV03256).

24 13. To date, I have incurred approximately 46.0 hours in connection with the litigation
25 of this lawsuit. Attached hereto as **Exhibit A** is a chart summarizing the amount of work I have
26 incurred to date on this matter.

27 14. The total lodestar for my hours will be approximately **\$32,200.00**, based on the
28 above total hours of 46.0 at an hourly rate of \$700.00 per hour.

15. My co-counsel and I will adequately represent the Class Members in this action.

Plaintiff's counsel has and will zealously represent Plaintiff and the Class Members and pursue this lawsuit to its conclusion.

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

Executed on July 6, 2026, at Glendale, California.

Twina Grigoryan

Elwina Grigoryan

EXHIBIT A

Roberts-Cooper v. Rise Luxury
Elwina Grigoryan Time and Task Chart

Hours	Description of Work
6.2	Initial meeting with client and review of documents and research re: theories of liability in preparation for filing of class action
2.0	Review Complaint; confer with co-counsel and client re same
1.2	Review PAGA letter; confer with co-counsel and client re same
0.9	Confer with co-counsel and client re amended PAGA letter
5.6	Conduct witness interviews and draft declarations in preparation for mediation
1.0	Confer with co-counsel and client re: First Amended Complaint
0.8	Meet and confer with Defendant re mediation
1.5	Meet and confer with co-counsel and Defendant's counsel re: data request and document production for mediation
2.5	Meet and confer with expert re: analysis
5.1	Review data, document production and expert analysis; meet and conferred with co-counsel regarding the same in preparation for mediation
6.0	Conferred with co-counsel re: mediation brief and preparation for mediation
8.0	Attended mediation
1.5	Review and analyze mediator's proposal; confer with client and co-counsel re same
2.1	Draft declarations for preliminary approval and conferred with client re same
0.6	Review order granting MPA
1.0	Prepared declarations for final approval and conferred with client re: same
46	TOTAL HOURS