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Attorneys for Plaintiffs and the Putative Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

KAYLA OLIVO AND AARON OMAN, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

SERVICELINK SERVICES, LLC, a Delaware Limited Liability Company; and DOES 1-50, inclusive.

Defendants.

CASE NO.: 30-2024-01426948-CU-OE-CXC

Assigned to the Hon. David A. Hoffer

DECLARATION OF JOSHUA FALAKASSA IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

HEARING INFO

Date: December 14, 2026
Time: 1:30 p.m.
Dept.: CX103

DECLARATION OF JOSHUA FALAKASSA

I, Joshua Falakassa, say and declare as follows:

1. I am an attorney at law, duly licensed to practice before all the Courts of the State of California, and I am the principal of Falakassa Law, P.C., co-counsel with Mehrdad Bokhour of The Bokhour Law Group, P.C., as attorney of record for Plaintiffs Kayla Olivo and Aaron Oman ("Plaintiffs") and the Class. As such, I am familiar with the file in this matter, and if called as a witness, I could and would competently testify to the following facts based on my personal knowledge.

2. I have been a member, in good standing, of the State Bar of California since 2013. I am admitted to practice before all California state courts, and the United States District Court of California for the Northern, Central District and Eastern District and have litigated class action and Private Attorney General Act ("PAGA") representative action cases in various courts across California.

3. I am a 2013 graduate from the University of California, Berkeley, School of Law, ("Berkeley Law") where I successfully completed courses in Labor Law, Employment Discrimination and Labor/Employment Arbitrations. During law school, I served as a summer associate at Sanford, Wittels and Heisler LLP, a boutique plaintiffs' side employment law firm focusing on FMLA wage and hour class action litigation, and other public interest lawsuits. As a second-year law student, I served as a summer associate at the San Francisco office of Littler Mendelson, P.C., I aided employers in defending wage and hour class action lawsuits filed under California and federal law.

4. From August 2018-January 2019, I as an associate at the Paul Haines Law Group, where I actively managed a caseload of more than 50 class and representative PAGA action lawsuits in California and federal courts.

5. Thereafter, as principal of Falakassa Law, P.C., I have handled well-over 100 employee vs. employer litigation matters, including more than 90 class action wage/hour and PAGA cases. Over the last few years, my practice has almost entirely consisted of representing employees, the majority of which has included class action and representative action wage and

hour matters. In total, I have handled upwards of 90 class action and representative action wage/hour cases.

6. I was selected as a "Super Lawyer Rising Star" in Employment Litigation during the years 2017-2025, a distinction that is reserved for the top 2.5 % of lawyers in the practice area. I have also been recognized by Topverdicts.com for achieving Top 1, Top 20 and Top 50 wage and hour class and/or PAGA action settlements in California in 2021-2024.

7. I am a member in good standing of the California Bar and have devoted my practice to representing employees in complex wage-and-hour class and representative actions. Based on my experience, as well as that of my co-counsel, we are well-qualified and fully prepared to litigate this matter through trial and appeal if necessary. However, after a thorough evaluation of the facts, applicable law, and the risks inherent in continued litigation, I strongly and unequivocally believe that the proposed Settlement is in the best interests of the Settlement Class.

8. In the opinion of Class Counsel, the recovery for each Settlement Class Member is well within the acceptable range for this type of action. This Settlement is also favorable, as the Settlement Class will promptly receive compensation rather than face the uncertainties inherent in further litigation and the years-long wait for this action to be tried. It is also telling that the Settlement Class has overwhelmingly supported the Settlement on the terms set forth in the Settlement Agreement. No Settlement Class Member has objected to the class-wide Settlement obtained in this matter, and only one Settlement Class Member requested exclusion. Based on all considerations, this Settlement is highly favorable and is in the best interests of the Settlement Class.

9. In sum, the relevant considerations overwhelmingly support final approval of the Settlement as fair, reasonable, and adequate. The Settlement is the product of informed, vigorous, and arm's-length negotiations conducted with the assistance of an experienced and respected mediator. Before reaching the Settlement, Class Counsel undertook substantial investigation, discovery, document review, and analysis of the claims, potential damages, and defenses, thereby ensuring that the negotiations were informed by a thorough understanding of the strengths and

weaknesses of the Action. Based on their extensive experience prosecuting wage-and-hour class actions, Class Counsel firmly believe that the Settlement represents an excellent result for the Settlement Class, particularly when weighed against the substantial risks, costs, delays, and uncertainties associated with continued litigation and trial. The reaction of the Settlement Class further supports this conclusion: not a single Class Member submitted an objection to the Settlement, and only one individual requested exclusion. This overwhelmingly favorable response provides compelling additional evidence that the Settlement is fair and serves the best interests of the Settlement Class. Considering the totality of the circumstances, I believe the Settlement falls well within the range of reasonableness and respectfully submit that final approval is warranted.

10. Class Counsel's request for attorneys' fees in the amount of $420,000, representing one-third (33.33%) of the $1,260,000 Gross Settlement Amount, is fair, reasonable, and fully justified by the nature of the litigation, the substantial work performed, the risks undertaken, and the result achieved for the Settlement Class. The Settlement's escalator provision was not triggered because the 60,022 Class Period workweeks did not exceed the applicable threshold of 62,455 workweeks. Accordingly, the Gross Settlement Amount remains $1,260,000. Importantly, the requested attorneys' fees are precisely the amount and percentage disclosed to Class Members in the Court-approved Notice of Settlement, and no Class Member objected to the requested award. The absence of objections further supports the conclusion that the requested fees are reasonable under the circumstances.

11. Class Counsel prosecuted this Action entirely on a contingent-fee basis, assuming the substantial financial risks inherent in complex wage-and-hour class litigation without any assurance of compensation or reimbursement. Throughout the litigation, Class Counsel devoted considerable attorney time, legal resources, and financial expenditures to investigating and prosecuting the claims, evaluating Defendant's defenses, analyzing potential class-wide exposure, and negotiating a favorable resolution. In doing so, Class Counsel necessarily forwent other potentially remunerative matters while bearing the possibility that, notwithstanding their efforts and expenditures, the Action might result in little or no recovery. The contingent nature of

the representation, the complexity of the claims, the risks of continued litigation, and the benefits ultimately obtained for the Settlement Class strongly support the requested fee award. Accordingly, I respectfully request that the Court approve $420,000 in Class Counsel Fees Payment and $17,275.15 in Class Counsel Litigation Expenses Payment, representing reimbursement of the litigation costs incurred in prosecuting this Action.

12. As further support for the reasonableness of the requested attorneys' fees, Class Counsel have incurred, or reasonably anticipate incurring through the completion of settlement administration, approximately 230 combined attorney hours in connection with the prosecution and resolution of this Action. Of those hours, I have personally incurred or reasonably anticipate incurring approximately 105 hours at my customary hourly rate of $725, resulting in a lodestar of $76,125. My co-counsel, Mehrdad Bokhour, has incurred or reasonably anticipates incurring approximately 125 hours at his customary hourly rate of $750, resulting in a lodestar of $93,750. Accordingly, Class Counsel's combined lodestar is approximately $169,875, exclusive of any additional time that may become necessary to address unforeseen issues arising during final approval or settlement administration. In my experience, these hourly rates are reasonable, customary, and consistent with prevailing market rates charged by attorneys of comparable skill, experience, and reputation who handle complex wage-and-hour class actions and representative PAGA litigation in California.

13. The requested Class Counsel Fees Payment of $420,000 represents an approximate 2.47 multiplier on Class Counsel's combined lodestar of $169,875. I believe this multiplier is reasonable and justified in light of the substantial contingent risk assumed by Class Counsel, the complexity and duration of the litigation, the skill and experience required to prosecute the claims effectively, and the meaningful monetary recovery obtained for the Settlement Class. The requested multiplier appropriately accounts for the significant possibility that Class Counsel could have devoted substantial additional time and resources to this litigation without recovering any fees whatsoever. In my opinion, the requested enhancement also fairly recognizes the successful resolution achieved for the Settlement Class while avoiding the additional expense, delay, and inherent uncertainty of continued litigation, class certification proceedings, dispositive motions,

trial, and potential appellate review. Accordingly, I believe the requested fee award is reasonable under both the percentage-of-the-fund and lodestar cross-check methods.

14. Finally, based on my experience practicing employment law and litigating wage-and-hour class actions, the hourly rates charged by Class Counsel are comparable to, and in certain instances lower than, those charged by California attorneys with similar experience, qualifications, and expertise. Both my customary hourly rate of $725 and Mr. Bokhour's customary hourly rate of $750 reasonably reflect our professional experience, the specialized nature of class and representative litigation, and prevailing market rates for comparable legal services. When considered together, the requested one-third percentage of the Gross Settlement Amount, the approximately 2.47 lodestar multiplier, the substantial contingent risk assumed, the favorable result obtained for the Settlement Class, and the complete absence of objections provide substantial support for the reasonableness of the requested award. For these reasons, I respectfully submit that the requested Class Counsel Fees Payment of $420,000 and Class Counsel Litigation Expenses Payment of $17,275.15 are fair, reasonable, and should be approved in their entirety.

15. My time on this Action is summarized by task in the following table. A true and correct copy of my detailed time records is attached hereto as Exhibit "A."

Task	**Hours**	**Fee**
Investigations/Complaint	63.5	$46,037.50
Pleadings	6.5	$4,712.50
Mediation/Settlement	19.5	$14,137.50
Motion for Preliminary Approval	6.5	$4,712.50
Motion for Final Approval	3.5	$2,537.50
Estimated Future Work	5.5	$3,987.50
Total	**105**	**$76,125**

16. The ultimate result was far from certain. When the firm took on this case on a contingency fee basis, it agreed to assume responsibility for all litigation costs. In the course of this Action, Class Counsel paid all costs, including filing fees, court costs, research fees, and mediation costs. There was never a guarantee that we would recoup those expenditures.

17. In my experience, California courts commonly award attorneys' fees based on a percentage of a common fund. Here, Class Counsel requests $420,000, which equals

approximately 33.33% of the Gross Settlement Amount.

18. The fee is warranted because of the results achieved for the Class Members, both in terms of the immediate cash settlement and the fact that the Class Members resoundingly supported the Settlement.

19. The proposed Settlement was the product of arm's length negotiations, including a full day mediation before experienced class action mediator Marc Feder, Esq.

20. Plaintiffs and Class Counsel have diligently investigated the claims raised in this litigation and, after taking into account the disputed factual and legal issues involved in this Action, the risks attending further prosecution, and the benefits to be received pursuant to the compromise and settlement of the Action as set forth in the Settlement, concluded that the Settlement terms are fair, reasonable, and in the best interest of the Class.

21. As the Settlement Agreement reveals, there is no preferential treatment for any segment of the Class, as the Settlement is designed to fairly and adequately compensate all Class Members. Pursuant to California Rules of Court Rule 3.769(b), the Parties have disclosed the agreed-upon and proposed attorneys' fees, which are well within the range of reasonableness for matters of this nature.

22. As set forth at the time of preliminary approval, Class Counsel's investigation into the facts and merits of the wage and hour claims alleged included analyzing substantial amounts of information, correspondence, documents, timekeeping and pay data, policies and procedures, and evidence relating to the class size and the commonality of the claims. During this process, Plaintiffs and Class Counsel investigated the potential claims of similarly situated employees and researched Defendant's defenses. Finally, Class Counsel synthesized and analyzed information provided by Defendant as to the total Class Members, the number of current and former employees, and the number of employees who worked during various time periods and prepared comprehensive damages calculations regarding the wage and hour claims at issue.

23. In light of the uncertainties of protracted litigation, this negotiated Settlement reflects the best practicable recovery for the Class. While the total Settlement amount is, of course, a compromise figure, Plaintiffs weighed the potential risks and opportunities, resulting in a fair

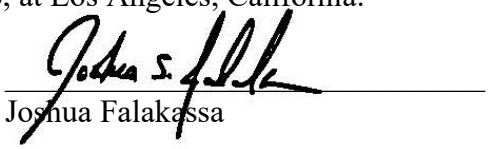
and equitable Settlement. Based upon detailed data obtained through discovery and information exchanges and factoring in claim certification and liability probabilities, Class Counsel formulated detailed damages models to evaluate the claims in preparation for mediation and reach a realistic and reasonable resolution.

24. Moreover, as further detailed in Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement, Defendant strongly disputed the merits of the case and the damages on several grounds.

25. The Settlement should be approved, and judgment entered based on the determination that the Settlement is fair, reasonable, adequate, and in the best interests of the Class.

26. In compliance with California Rules of Professional Conduct, rule 1.5.1, Plaintiffs signed a fee split agreement that provides that fees will be allocated between Class Counsel as follows: fifty percent (50%) to the Bokhour Law Group, P.C., and fifty percent (50%) to Falakassa Law, P.C.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct, this 17th day of November 2026, at Los Angeles, California.



Joshua Falakassa

EXHIBIT “A”

Date	Attorney	Description of Services	Hours	Rate ($/hr)	Fee ($)	Task / Category
	Joshua S. Falakassa	Review initial intake materials and evaluate potential employment and wage claims.	2.5	$725.00	$1,812.50	Investigations/Complaint
	Joshua S. Falakassa	Confer with client and co-counsel regarding factual background and prospective representative claims.	2.0	$725.00	$1,450.00	Investigations/Complaint
	Joshua S. Falakassa	Review initial employment documentation, compensation records and available pay statements.	3.0	$725.00	$2,175.00	Investigations/Complaint
	Joshua S. Falakassa	Analyze personnel and payroll materials for potential wage-and-hour violations.	3.5	$725.00	$2,537.50	Investigations/Complaint
	Joshua S. Falakassa	Review employee handbook and applicable written compensation and scheduling policies.	2.5	$725.00	$1,812.50	Investigations/Complaint
	Joshua S. Falakassa	Evaluate meal-period, rest-period and unpaid-wage theories under California law.	3.0	$725.00	$2,175.00	Investigations/Complaint
	Joshua S. Falakassa	Analyze overtime, regular-rate and wage-statement issues reflected in available records.	3.0	$725.00	$2,175.00	Investigations/Complaint
	Joshua S. Falakassa	Review and evaluate potential waiting-time and derivative statutory claims.	2.5	$725.00	$1,812.50	Investigations/Complaint
	Joshua S. Falakassa	Research and evaluate PAGA exposure and administrative notice requirements.	3.0	$725.00	$2,175.00	Investigations/Complaint
	Joshua S. Falakassa	Review proposed class definitions and potential common evidence of challenged practices.	3.5	$725.00	$2,537.50	Investigations/Complaint
	Joshua S. Falakassa	Confer with co-counsel concerning claim investigation and case development strategy.	2.0	$725.00	$1,450.00	Investigations/Complaint
	Joshua S. Falakassa	Communicate with client regarding alleged practices, schedules and potential witnesses.	3.0	$725.00	$2,175.00	Investigations/Complaint
	Joshua S. Falakassa	Review additional employee information and investigate corroborating sources.	3.0	$725.00	$2,175.00	Investigations/Complaint
	Joshua S. Falakassa	Investigate additional class members and evaluate potential representative testimony.	4.0	$725.00	$2,900.00	Investigations/Complaint
	Joshua S. Falakassa	Communicate with prospective class members regarding factual circumstances and records.	4.0	$725.00	$2,900.00	Investigations/Complaint
	Joshua S. Falakassa	Evaluate information obtained from additional employee interviews and outreach.	3.0	$725.00	$2,175.00	Investigations/Complaint
	Joshua S. Falakassa	Analyze employer defenses and the effect of potential arbitration provisions.	3.0	$725.00	$2,175.00	Investigations/Complaint
	Joshua S. Falakassa	Review factual allegations and revise supporting chronology for class/PAGA pleadings.	3.0	$725.00	$2,175.00	Investigations/Complaint
	Joshua S. Falakassa	Confer with co-counsel regarding factual allegations and complaint-related investigation.	2.5	$725.00	$1,812.50	Investigations/Complaint
	Joshua S. Falakassa	Review follow-up materials and evaluate additional factual support for asserted claims.	3.0	$725.00	$2,175.00	Investigations/Complaint
	Joshua S. Falakassa	Coordinate investigation and client communications necessary to prepare the operative claims.	4.5	$725.00	$3,262.50	Investigations/Complaint
	Joshua S. Falakassa	Review operative complaint and analyze issues requiring additional allegations.	1.5	$725.00	$1,087.50	Pleadings
	Joshua S. Falakassa	Review and revise pleading allegations concerning wage-and-hour theories.	1.5	$725.00	$1,087.50	Pleadings
	Joshua S. Falakassa	Review case-management filings and relevant court orders.	1.0	$725.00	$725.00	Pleadings
	Joshua S. Falakassa	Confer with co-counsel regarding pleading amendments and litigation procedure.	1.0	$725.00	$725.00	Pleadings
	Joshua S. Falakassa	Review and revise stipulation or other pleading-related submissions.	1.5	$725.00	$1,087.50	Pleadings

Date	Attorney	Description of Services	Hours	Rate ($/hr)	Fee ($)	Task / Category
	Joshua S. Falakassa	Review available payroll/timekeeping information and evaluate potential class/PAGA exposure.	3.0	$725.00	$2,175.00	Mediation/Settlement
	Joshua S. Falakassa	Evaluate settlement valuation assumptions, statutory penalties and litigation risks.	2.5	$725.00	$1,812.50	Mediation/Settlement
	Joshua S. Falakassa	Analyze defense positions and evidentiary issues affecting mediation value.	2.0	$725.00	$1,450.00	Mediation/Settlement
	Joshua S. Falakassa	Review and revise mediation brief and supporting factual analysis.	3.0	$725.00	$2,175.00	Mediation/Settlement
	Joshua S. Falakassa	Confer with co-counsel regarding mediation strategy and settlement objectives.	1.5	$725.00	$1,087.50	Mediation/Settlement
	Joshua S. Falakassa	Prepare for and participate in mediation and settlement negotiations.	3.0	$725.00	$2,175.00	Mediation/Settlement
	Joshua S. Falakassa	Communicate with client regarding proposed settlement terms and options.	1.0	$725.00	$725.00	Mediation/Settlement
	Joshua S. Falakassa	Review and revise settlement agreement and associated release terms.	2.0	$725.00	$1,450.00	Mediation/Settlement
	Joshua S. Falakassa	Confer with counsel regarding settlement documentation and implementation.	1.5	$725.00	$1,087.50	Mediation/Settlement
	Joshua S. Falakassa	Review settlement agreement and evaluate preliminary-approval requirements.	1.5	$725.00	$1,087.50	Motion for Preliminary Approval
	Joshua S. Falakassa	Review and revise motion for preliminary approval and supporting memorandum.	2.0	$725.00	$1,450.00	Motion for Preliminary Approval
	Joshua S. Falakassa	Prepare/revise counsel declaration and settlement fairness discussion.	1.5	$725.00	$1,087.50	Motion for Preliminary Approval
	Joshua S. Falakassa	Review proposed notice, administration terms and preliminary-approval order.	1.0	$725.00	$725.00	Motion for Preliminary Approval
	Joshua S. Falakassa	Confer with co-counsel regarding finalization and filing of approval papers.	0.5	$725.00	$362.50	Motion for Preliminary Approval
	Joshua S. Falakassa	Review final-approval submissions and settlement implementation materials.	1.0	$725.00	$725.00	Motion for Final Approval
	Joshua S. Falakassa	Review and revise final-approval memorandum and supporting declaration.	1.5	$725.00	$1,087.50	Motion for Final Approval
	Joshua S. Falakassa	Review settlement administrator reporting and available member response information.	0.5	$725.00	$362.50	Motion for Final Approval
	Joshua S. Falakassa	Confer with co-counsel regarding final hearing and filing materials.	0.5	$725.00	$362.50	Motion for Final Approval
	Joshua S. Falakassa	Anticipated review of settlement administrator reporting and distribution/accounting issues.	2.0	$725.00	$1,450.00	Estimated Future Work
	Joshua S. Falakassa	Anticipated responses to class member or administrator inquiries and coordination with counsel.	1.5	$725.00	$1,087.50	Estimated Future Work
	Joshua S. Falakassa	Anticipated review of settlement completion and post-approval compliance materials.	2.0	$725.00	$1,450.00	Estimated Future Work
		TOTAL	**105.0**		**$76,125.00**	