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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

BRIAN LOZA, as an individual and on behalf
of all others similarly situated,

Plaintiff,

vs.

HIDDEN VALLEY INVESTMENTS, INC.,
dba QUALITY CHEVROLET and
QUALITY CHEVROLET COMMERCIAL
TRUCK, a California Corporation; and DOES
1 through 100,

Defendants.

Case No.: 24CU009062C

*[Case Assigned for all purposes to the Hon.
Katherine A. Bacal; Dept. C-63]*

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

Date: November 14, 2025
Time: 1:30 p.m.
Dept.: C-63

Action Filed: September 3, 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 Plaintiff Brian Loza (“Plaintiff”) 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 Plaintiff, I have been closely involved in all aspects of this litigation
10 since its inception. The details of the work completed by Plaintiff’s Counsel in this case are set
11 forth in the declaration of Andrew J. Rowbotham, 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, Apex Class Action Administration.

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 October 22, 2025, at El Segundo,
19 California.

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22 Aden M. Khachadorian
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