

WILSHIRE LAW FIRM, PLC
Tyler J. Woods, Esq. (SBN 232464)
tyler.woods@wilshirelawfirm.com
James Yoo, Esq. (SBN 310680)
james.yoo@wilshirelawfirm.com
Heriberto Ponce, Esq. (SBN 339713)
eddie.ponce@wilshirelawfirm.com
Ruby Carrera, Esq. (SBN 343745)
ruby.carrera@wilshirelawfirm.com
Alan Wilcox (SBN 287476)
alan.wilcox@wilshirelawfirm.com
Conor Gomez (SBN 337395)
conor.gomez@wilshirelawfirm.com
660 S. Figueroa Street, Sky Lobby
Los Angeles, CA 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiffs

[Additional Counsel on Next Page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

JUAN BECERRA and MARIA CAMACHO, on
behalf of the State of California and other
aggrieved persons,

Plaintiffs,

v.

PULMUONE FOODS USA, INC., an Iowa
corporation; PULMUONE U.S.A., INC., a
California corporation; NASOYA FOODS USA,
LLC, a Delaware limited liability company; and
DOES 1 through 10, inclusive,

Defendants.

Case No.: 24CV450003

Assigned to Hon. Beth McGowen, Dept. 22

Complaint filed: October 21, 2024
FAC filed: December 26, 2024
SAC filed: May 19, 2026
Trial date: Not set

PAGA REPRESENTATIVE ACTION

**DECLARATION OF NIDAH FARISHTA
IN SUPPORT OF PLAINTIFFS'
MOTION TO APPROVE PAGA
SETTLEMENT**

Approval Hearing Date

Date: January 14, 2027
Time: 1:30 p.m.
Dept.: 22

1 Roman Otkupman, CSBN 249423
Roman@OLFLA.com
2 Nidah Farishta, CSBN 312360
Nidah@OLFLA.com
3 **OTKUPMAN LAW FIRM, A LAW CORPORATION**
5743 Corsa Ave., Suite 123
4 Westlake Village, CA 91362
Telephone: (818) 293-5623
5 Facsimile: (888) 850-1310
6 Attorneys for Plaintiffs

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **I, NIDAH FARISHTA, declare as follows:**

2 1. I am an attorney duly admitted to the practice of law in the State of California. I
3 am an Attorney at Otkupman Law Firm, A Law Corporation, and counsel for Plaintiffs as well
4 as proposed PAGA Counsel in this action. I have personal knowledge of the facts set forth herein
5 and if called as a witness to testify to them, I could and would do so competently.

6 2. I obtained my Bachelor's degrees from Southern Methodist University in Dallas,
7 Texas in 2013. I majored in Philosophy and Sports Management.

8 3. Thereafter, I attended University of San Diego School of Law and graduated with
9 a Juris Doctor degree in 2016.

10 4. I became a member of the California bar in December of 2016 and have been an
11 active member in good standing continuously through that time.

12 5. Since June of 2017, I have been employed at Otkupman Law Firm, A Law
13 Corporation. I have been directly involved in litigating numerous wage and hour class action
14 cases and have focused my practice exclusively in employment litigation.

15 6. While employed at the Otkupman Law Firm, A Law Corporation, I have been
16 appointed as Class Counsel in numerous class action wage and hour cases.

17 7. Otkupman Law Firm, A Law Corporation prosecutes wage and hour cases on
18 behalf of the employees whose rights have been violated. Otkupman Law Firm, A Law
19 Corporation, either on its own or with co-counsel is currently serving as Plaintiff's counsel of
20 record in dozens of wage and hour and employment class action cases pending in both state and
21 federal court.

22 8. Otkupman Law Firm, A Law Corporation has successfully litigated and resolved
23 numerous wage and hour class actions involving failure to pay wages, wage statement violations
24 and derivative Labor Code claims and penalties.

25 ///

26 ///

27 ///

28 ///

///

1 9. I have spent no less than 4 hours on this case from its inception to the present. My
2 current hourly rate is \$600.00 per hour as an attorney practicing for over 9 years and based on
3 my experience as counsel of record in numerous wage and hour and employment class action
4 cases

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

7 Executed this 5th day of June 2026 at Winchester, California.

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



Nidah Farishta