

Luiza Manuelian (SBN 233154)
LManuelian@GrantShenon.com
Evelyn Zarraga (SBN 296835)
EZarraga@GrantShenon.com
GRANT SHENON ALMARAZ, APLC
15165 Ventura Boulevard, Suite 200
Sherman Oaks, California 91403
Telephone: (818) 881-5000
Facsimile: (818) 881-1150

Attorneys for Defendant Airport Terminal Management, Inc.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

MARLIN OSORIO, individually, and on behalf of
all others similarly situated,

Plaintiff,

vs.

AIRPORT TERMINAL MANAGEMENT, INC., a
California corporation; and DOES 1 through 10,
inclusive,

Defendants

Case No.: 24STCV26945

Related Case No.: 24STCV27765

CLASS AND REPRESENTATIVE ACTION

[Assigned for all purposes to the Hon. William F.
Highberger, Dept. 10]

**DECLARATION OF LUIZA MANUELIAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Action filed: October 15, 2024

Trial date: Not set

I, Luiza Manuelian, hereby declare and state as follows:

2. I am an attorney admitted to practice in the State of California, and I am admitted to appear before this Court. I am an attorney of the law firm of GRANT SHENON ALMARAZ, APLC, and I am one of the attorneys responsible for representing Defendant Airport Terminal Management, Inc. in the above-captioned lawsuit and the related action, *Susana Catalina Hernandez v. Airport Terminal Management, Inc.* pending in Superior Court of the State of California, County of Los Angeles, Case No. 24STCV27765. All of the pleadings in this lawsuit are maintained in our office in the ordinary course of business under my direction and control.

3. At the time of mediation and settlement of herein lawsuits, I was not aware of any class, representative, or other collective action in any other court in this or any other jurisdiction that asserted claims similar to those asserted in this action or the related action on behalf of a class or group of individuals, some or all of whom would also be member of the class defined in this action. However, after the parties signed the long form settlement agreement and finalized the terms of the settlement, Airport Terminal Management, Inc. was served with a PAGA notice on December 29, 2025, by class member Cynthia Perez. On December 23, 2025, Ms. Perez filed a Class Action Complaint, Case No.: 25STCV38505, alleging similar labor code violations as identified in the above-captioned lawsuit and the *Hernandez* matter.

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

This declaration was executed on February 3, 2026, at Sherman Oaks, California.



Luiza Manuelian, Esq.