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Attorney for Plaintiff,
Robert Houston Jr., on behalf of himself, and all others similarly situated, and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF KERN

ROBERT HOUSTON JR., on behalf of himself, and all others similarly situated, and on behalf of the general public,

Plaintiff,

vs.

POWER MACHINERY CENTER, a California Corporation, and DOES 1 through 10, inclusive,

Defendants.

Case No. BCV-24-104326

DECLARATION OF NIDAH FARISHTA IN SUPPORT OF PLAINTIFF ROBERT HOUSTON JR.'S MOTION FOR APPROVAL OF PAGA SETTLEMENT

Date: October 28, 2026
Time: 8:30 a.m.
Dept.: Division J
Judge: Hon. Gregory Pulsksmp

I, Nidah Farishta, declare as follows:

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

2. I make this declaration in support of Plaintiff's Motion for Approval of PAGA Settlement.

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

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

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

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

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

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

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

10. I have spent no less than 17 hours on this case from its inception to the present. My current hourly rate is $600.00 per hour as an attorney practicing for over 9 years and based on my experience as counsel of record in numerous wage and hour and employment class action cases.

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

Executed this 12th day of October 2026 at Winchester, California.



Nidah Farishta