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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

12 ANA RAMIREZ, individually, and on behalf
13 of all others similarly situated,

Plaintiffs,

v.

15 PFC MANAGEMENT LLC, a Delaware
16 limited liability company; and DOES 1 through
17 10, inclusive,

Defendants.

Case No.: 24STCV21957

*[Assigned for All Purposes to the Hon.
Samantha Jessner, Dept. 7]*

**DECLARATION OF JOHN G. YSLAS IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Final Approval Hearing:

Date: October 14, 2025

Time: 10:00 a.m.

Dept: 7

Action Filed: August 27, 2024

DECLARATION OF JOHN G. YSLAS

I, John G. Yslas, declare as follows:

1. I am an attorney at law licensed to practice before all of the courts of the State of California. I am a Senior Partner at Wilshire Law Firm, PLC (“WLF”), counsel of record for Plaintiff Ana Ramirez (“Plaintiff”). I have personal knowledge of the facts set forth in this declaration and could and would competently testify to them under oath if called as a witness.

2. I submit this declaration in support of Plaintiff’s Motion for Final Approval of Class Action and PAGA Settlement.

3. Plaintiff is represented by WLF. The attorneys at WLF performed significant work and expended litigation costs in prosecuting this matter with no guarantee of payment.

4. WLF was selected by Best Lawyers and U.S. News & World Report as one of the nation’s Best Law Firms since 2020 and is comprised of more than 100 attorneys and over 600 employees. WLF is actively and continuously practicing in employment litigation, representing employees in both individual and class actions in both state and federal courts throughout California.

5. WLF is qualified to handle this litigation because its attorneys are experienced in litigating Labor Code violations in individual, class action, and representative action cases. WLF has handled, and is currently handling, numerous wage and hour class action lawsuits, as well as class actions involving consumer rights and data privacy litigation.

6. I graduated from the University of California, Santa Barbara with High Honors in 1991 with Bachelor of Arts degrees in Psychology. I received my Juris Doctor from UCLA Law School in 1996.

7. Upon graduating from law school in 1996, I worked for a boutique law firm practicing general litigation which included employment law matters. Since 2000 (that is, the last 25 years) my practice has been exclusively focused on labor and employment matters including handling wage and hour class, collective and representative actions (including the California Private Attorneys General Act, or “PAGA”), including in the international law firms

1 of Morgan, Lewis & Bockius LLP (where I was a senior associate), Foley & Lardner LLP
2 (where I was a partner and a national Vice Chair of the Labor and Employment Group), Norton
3 Rose Fulbright LLP (where I was a partner) and Seyfarth Shaw LLP (where I was a partner and
4 member of the Wage and Hour Practice Group). During my time at these law firms, I was the
5 primary attorney or took a major leading role in defending employers on numerous wage and
6 hour class, collective and representative actions.

7 8. In late June 2022, I left Seyfarth Shaw LLP and joined my current firm, Wilshire
8 Law Firm, PLC, to represent plaintiff employees. I have been and am handling many wage and
9 hour class and representative actions litigating such matters on behalf of plaintiff employees in
10 numerous Superior Courts and District Courts. From matters representing both plaintiffs and
11 defendants, I have successfully mediated the resolution of many wage and hour class,
12 collective, and representative actions. Since starting to settle cases in late April 2023, I have
13 already successfully mediated matters in which I have been counsel or co-counsel resulting in
14 **over \$168 million** in settlements and verdicts which are in the process of being finalized, and
15 with numerous upcoming mediations scheduled. In those and numerous other matters, I have
16 managed and assisted with the litigation and settlement of many wage and hour PAGA and
17 class actions. In those actions, I performed similar tasks as those performed in the course of
18 prosecuting this action. Indeed, I recently tried and prevailed in achieving a jury verdict in a
19 wage and hour class action in the matter of *Aguilar-Flores v. Javier's – CC LLC*, Los Angeles
20 County Superior Court, Case No. 19STCV36438 (damages anticipated in the future and a
21 motion for attorney's fees to be filed after that).

22 9. I have received numerous awards for my legal work. For example, from 2015 to
23 2018, I was listed in Los Angeles Super Lawyers for Employment Litigation (Thomson
24 Reuters). I have also served on numerous prominent boards and in other leadership positions,
25 including serving as Southern California Regional President for the Hispanic National Bar
26 Association and on the board of directors of the Mexican American Bar Foundation. I also
27 previously served on the 5-member Los Angeles Civil Service Commission, which generally
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1 oversees the personnel decisions for the City of Los Angeles.

2 10. I have also published numerous blogs on labor and employment issues including
3 on wage and hour issues. For example, I published “Headline News: Wal-Mart v. Dukes-
4 Impact on Class Action Litigation” (while a partner with Foley & Lardner LLP) and “Are You
5 Really Protected From Wage-and-Hour Successor Liability in an Asset Purchase” (while a
6 partner with Seyfarth Shaw LLP). I have also been a presenter at numerous conferences,
7 including being a presenter involving the “Employment Law Update” at a National
8 Employment Law Council conference. My hourly billing rate is \$1,500.00.

9 11. Arrash T. Fattahi (“Mr. Fattahi”) is a junior partner at WLF. Mr. Fattahi
10 graduated from the University of California, Los Angeles with a Bachelor of Arts in Political
11 Science, summa cum laude. He received his Juris Doctor from The George Washington
12 University Law School. During law school, Mr. Fattahi was a member of the student editorial
13 board for the Federal Circuit Bar Journal. His practice is focused on advocating for the rights
14 of consumers and employees in class action litigation. Mr. Fattahi is currently the managing
15 attorney in charge of litigating several class action cases in state and federal courts in
16 California. He has over four (4) years of experience litigating wage and hour class actions. Mr.
17 Fattahi was selected as a “Southern California Rising Star” in 2025. His hourly billing rate is
18 \$750.00.

19 12. Aram Boyadjian (“Mr. Boyadjian”) is an associate attorney at WLF. Mr.
20 Boyadjian graduated from the University of California, Los Angeles with a Bachelor of Arts
21 in Political Science. He received his Juris Doctor from Loyola Law School. During law school,
22 Mr. Boyadjian was a member of the student editorial board for the International and
23 Comparative Law Review. Since being admitted to practice law in California in January 2021,
24 his practice has mainly been focused on wage and hour class action litigation. Mr. Boyadjian
25 currently bills at an hourly rate of \$600.00.

26 13. Fawn F. Bekam (“Ms. Bekam”) was a junior partner at WLF. Ms. Bekam is a
27 graduate of the University of California, Irvine School of Law, where she received her J.D. in
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1 2015. She received her B.A. from the University of California, Los Angeles in 2012. While in
2 law school, Ms. Bekam was the recipient of numerous honors, including multiple Dean's
3 Awards, Dean's Merit Scholarship, and pro bono graduation honors. She has been chosen as a
4 Super Lawyer Rising Star every year since 2020 and selected for inclusion in Best Lawyers:
5 Ones to Watch every year since 2021. Ms. Bekam has been appointed class counsel in dozens
6 of cases through both contested and uncontested motions. Ms. Bekam's hourly billing rate was
7 \$800.00.

8 14. Courtney M. Miller ("Ms. Miller") is a Settlement Attorney at WLF. She was
9 admitted to practice law in the State of California in 2019. Ms. Miller graduated from the
10 University of California, Santa Cruz, with a Bachelor of Arts in Sociology. Prior to becoming
11 an attorney, Ms. Miller worked at a boutique civil litigation firm for nearly a decade, primarily
12 handling employment matters. She earned her Juris Doctor from Southwestern Law School in
13 2019. Ms. Miller has prosecuted wage and hour class and PAGA actions, almost exclusively,
14 since 2020. As a handling attorney, Ms. Miller obtained over \$30 million dollars in settlements
15 on behalf of California employees. Ms. Miller's hourly billing rate is \$650.00.

16 15. WLF's hourly rates are comparable to those charged by other class action
17 plaintiffs' counsel and the firms defending class actions. WLF's hourly rates have been
18 approved by other courts in California. *See, e.g., Matthew Veliz v. DrinkPak, LLC*, Los Angeles
19 County Superior Court, Case No. 22STCV37384, *Ismael Villegas-Sanchez v. COE Orchard*
20 *Equipment, Inc.*, Sutter County Superior Court, Case No. CVCS22-0002261; *Jessica Bronsal*
21 *v. PTI Technologies Inc.*, Ventura County Superior Court, Case No. 202200570361CUOE;
22 *Miguel A. Vigil Ruiz v. The De Ruosi Group, LLC*, San Joaquin County Superior Court, Case
23 No. STK-CV-UOE-2022-8780; *Gutierrez v. Top Drawer Merch, LLC et al*, Los Angeles
24 County Superior Court, Case No. 23STCV04299; *Wing v. Road Machinery, LLC et al*, Kern
25 County Superior Court, Case No. BCV-22-102896; *Hernandez v. SGPS Showrig Los Angeles,*
26 *Inc.*, Los Angeles County Superior Court, Case No. 22STCV28155; *Azevedo v. Tulare Nursing*
27 *& Rehabilitation Hospital, Inc.*, Tulare County Superior Court, Case No. VCU293325; *Haser*
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1 *v. Universal Chain of California, Inc.*, Sacramento County Superior Court, Case No. 34-2022-
2 00332268; *Caldera v. Performance Online, Inc. et al*, Riverside County Superior Court, Case
3 No. CVRI2306013; *Goosby v. CiminoCare, Inc.*, Sacramento County Superior Court, Case No.
4 34-2022-00329033; *Rooks v. Hot Cakes Restaurant Group, Inc.*, San Joaquin County Superior
5 Court, Case No. STK-CV-UOE-2022-11056; *Garcia v. Compassionate Heart*, Orange County
6 Superior Court, Case No. 30-2022-01294409-CU-OE-CXC; *Parra v. Citrus Valley*
7 *Management Services, Inc.*, Riverside County Superior Court, Case No. CVRI2301768; *Torres*
8 *v. HomeShield Pest Control Inc.*, Placer County Superior Court, Case No. S-CV-0049525;
9 *Cabrera v. Creekside Auto Group*, Santa Clara County Superior Court, Case No. 23CV415661;
10 *Simpson v. Arcos*, Riverside Superior Court, Case No. CVRI2303337; *Payne v. Planned*
11 *Parenthood: Shasta-Diablo, Inc.*, San Francisco County Superior Court, Case No. CGC-23-
12 607359. The total hours expended on this action are reasonable and in line with comparable
13 cases.

14 16. WLF has performed significant work and incurred litigation costs in prosecuting
15 this matter with no guarantee of any payment. The efforts expended by Plaintiff's counsel to
16 achieve this result include, but are not limited to, the following:

17 a. the investigation of the matter, including meeting with Plaintiff, reviewing
18 Defendant's policies, and requesting and reviewing Plaintiff's time and pay records, personnel
19 files, and exploring the corporate structure of Defendant;

20 b. filing the lawsuit;

21 c. attending status conferences and meeting and conferring with Defendant
22 regarding the case;

23 d. meeting and conferring with Defendant regarding mediation, exchanging of
24 informal discovery beforehand, and negotiating with opposing counsel regarding the
25 parameters thereof;

26 e. selecting a mediator and mediation date;

27 f. working with opposing counsel and expert consultants for the receipt of a
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1 representative sampling and analyzing the same with the aid of expert consultants and Plaintiff
2 to perform analyses of liability and exposure prior to attendance of the mediation in this matter;

3 g. reviewing policy documents from Defendant and researching applicable
4 defenses;

5 h. preparation of the mediation brief and damages model for use at mediation;

6 i. attendance at the mediation by Counsel;

7 j. communicating with Plaintiff who requested updates or other information
8 regarding this matter;

9 k. negotiating, finalizing and fully executing the settlement agreement;

10 l. preparing and filing the Motion for Preliminary Approval and supporting
11 documents;

12 m. negotiating, finalizing and fully executing the amended settlement agreement;

13 n. attending hearings;

14 o. communicating with any class members who sought additional information
15 regarding the settlement, including answering questions regarding the settlement and obtaining
16 updated addresses from class members for purposes of receiving the class notices and
17 administering the settlement checks; and

18 p. preparing the instant Motion for Final Approval and supporting documents.

19 17. WLF's current lodestar reflects the efficiencies achieved by attorneys
20 experienced in this field with **104.2** hours of work resulting in **\$116,485.00** in fees. WLF
21 dedicated significant resources to this case by dividing the tasks required according to skill
22 level. The estimated hours expended by each attorney were not duplicative and reflect the
23 extensive investigation and analysis that was required to achieve this Settlement. This amount
24 does not include the time Class Counsel will spend at the final approval hearing and assisting
25 the Settlement Administrator following final approval. The chart below shows the calculation
26 of hours spent by each of WLF's attorneys on this case:

Attorney	Hours	Hourly Rate	Total
Arrash T. Fattahi	0.50	\$750.00	\$375.00
Aram Boyadjian	1.40	\$600.00	\$840.00
Courtney M. Miller	10.0	\$650.00	\$6,500.00
John G. Yslas	39.90	\$1,500.00	\$59,850.00
Fawn F. Bekam	42.40	\$800.00	\$33,920.00
TOTAL	104.2		\$116,485.00

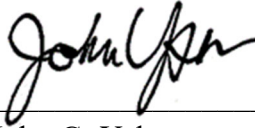
18. The risk factors present in this case favor the application of a 1.14 multiplier. To begin, Class Counsel singularly assumed the risk and costs of litigation purely on a contingency basis. And, while Plaintiff is confident in the merits of her claims, a legitimate controversy exists as to each cause of action posing an actual risk that Plaintiff may not succeed at class certification and/or trial. Any of these obstacles could have prevented recovery completely, meaning Class Counsel would have been left with no compensation for all the time and money invested in litigating this case. Despite these risks, Class Counsel took this case on a contingency basis so that Class Members (a particularly vulnerable group of hourly paid workers) could be compensated for their unpaid wages. Consequently, Class Counsel was precluded from focusing on, or taking on, other cases which could have resulted in a larger, and less risky, monetary gain. This time could have been spent on other potentially lucrative cases.

19. In litigation costs, WLF has incurred \$18,487.89 in costs for expenses such as filing fees, service fees, mediation fees, and expert fees. Since Class Counsel's costs do not exceed the maximum of \$25,000.00, the remaining \$6,512.11 will revert to the Net Settlement Amount. A true and correct copies of WLF's cost reports in this matter are attached hereto as **Exhibit 1**. All of the costs incurred were reasonable and necessary for the prosecution of this case.

20. Class Counsel has negotiated a settlement here that they believe is fair, reasonable, and adequate based on their prior experience litigating these types of cases.

1 21. To date, the LWDA has not responded to or objected to the Settlement in this
2 matter.

3 I declare under penalty of perjury under the laws of the State of California that the
4 foregoing is true and correct. Executed on September 19, 2025 at Los Angeles, California.

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7 John G. Yslas
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EXHIBIT 1

EXHIBIT 1

Expenses Subtotals - Filtered Exp. Type

As of 2025-09-15 09:10:45 Pacific Standard Time/PST • Generated by Tara Arnold

Filtered By
Show: All matters
Matter: ID equals a0LPc00000B5sSu
Expense Type equals E127 — DTF,DTF,E108 — Postage,E102 — Printing

Display Name ↑	Expense Type ↑	Date	Expense: Expense ID	Provider Name	Note	Amount	Reduction Amount	Amount Paid	Amount Due.
Ana Ramirez - Wage & Hour: 5/31/2024	DTF	6/24/2024	E-3220325		Docusign envelope	\$1.89			\$1.89
	Subtotal	Sum				\$1.89	\$0.00	\$0.00	\$1.89
		Count	1						
	E108 — Postage	11/1/2024	E-3237027			\$8.44			\$8.44
		8/13/2024	E-3222672			\$8.16			\$8.16
	Subtotal	Sum				\$16.60	\$0.00	\$0.00	\$16.60
Subtotal		Count	2						
		Sum				\$18.49	\$0.00	\$0.00	\$18.49
Total		Count	3						
		Sum				\$18.49	\$0.00	\$0.00	\$18.49



WILSHIRE
LAW FIRM

Client Cost Report

Account	Type	Date	Num	Name	Matter Display Name	Line Memo	Amount
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	7/2/2025	CC073125TA-710	One Legal LLC	PFC Management LLC (Ramirez) - Wage & Hour (Class Action)	25742320-255076-Atty Svc for Court Filing-Notice-PFC Management LLC (Ramirez) - Wage & Hour (Class Action)	\$17.50
501500 Cost of Sale : Court Filing Fees	C r e d i t Card	7/3/2025	CC073125TA-754	One Legal LLC	PFC Management LLC (Ramirez) - Wage & Hour (Class Action)	25747944-255076-Atty Svc for Court Filing-Change of Address-PFC Management LLC (Ramirez) - Wage & Hour (Class Action)	\$23.44
502500 Cost of Sale : Legal Expenses	Bill	7/1/2025	423943	Case Anywhere LLC	PFC Management LLC (Ramirez) - Wage & Hour (Class Action)	423943-PFC Management (Ramirez)-System Access Fee 06.2025	\$49.00
502500 Cost of Sale : Legal Expenses	Bill	8/4/2025	436511	Case Anywhere LLC	PFC Management LLC (Ramirez) - Wage & Hour (Class Action)	436511-Ana Ramirez-System Access Fee: 07/01/25 to 07/31/25	\$55.00
502500 Cost of Sale : Legal Expenses	Bill	9/2/2025	449072	Case Anywhere LLC	PFC Management LLC (Ramirez) - Wage & Hour (Class Action)	449072-PFC Management LLC (Ramirez)-System Access Fee 8/1/25 - 8/31/25	\$49.00
Total							\$193.94

Wilshire Law Firm, PLC
Client Costs Detailed Report
All Transactions

09/15/25

Accrual Basis

Type	Date	Num	Class	Source Name	Memo	Amount	Balance
500000 · COS							
501500 · Court Filing Fees							
Credit C...	04/18/2025		PFCMgmt(Ramirez).W&H	Los Angeles Superior Court	RMPA-2025-309213707- 255076-PFCMgmt(Ramirez).W&H	5.40	5.40
Credit C...	08/28/2024	23615981	PFCMgmt(Ramirez).W&H	One Legal LLC	23615981-255076-Atty Svc for Court Filing-Compl,CCCS,Sum-PFC...	1,497.05	1,502.45
Credit C...	11/04/2024	24065990	PFCMgmt(Ramirez).W&H	One Legal LLC	24065990-255076-Atty Svc for Court Filing-SCR-PFCMgmt(Ramirez...	21.37	1,523.82
Credit C...	01/23/2025	24563737	PFCMgmt(Ramirez).W&H	One Legal LLC	24563737-255076-Atty Svc for Court Filing-Amended Comp-PFCMg...	23.44	1,547.26
Credit C...	02/24/2025	24776835	PFCMgmt(Ramirez).W&H	One Legal LLC	24776835-255076-Atty Svc for Court Filing-Acknowl of Rec-PFCMg...	23.44	1,570.70
Credit C...	02/27/2025	24806335	PFCMgmt(Ramirez).W&H	One Legal LLC	24806335-255076-Atty Svc for Court Filing-SCR-PFCMgmt(Ramirez...	23.44	1,594.14
Credit C...	03/10/2025	24875250	PFCMgmt(Ramirez).W&H	One Legal LLC	24875250-255076-Atty Svc for Court Filing-Declar,Ord-PFCMgmt(R...	86.42	1,680.56
Credit C...	06/23/2025	25657763	PFCMgmt(Ramirez).W&H	One Legal LLC	25657763-255076-Atty Svc for Court Filing-Ord-PFCMgmt(Ramirez)...	17.50	1,698.06
Bill	10/14/2024	81341	PFCMgmt(Ramirez).W&H	Valpro Attorney Services, LLC	81341-PFCMgmt(Ramirez).W&H-File POS	45.00	1,743.06
Total 501500 · Court Filing Fees						1,743.06	1,743.06
502500 · Legal Expenses							
Bill	02/05/2025	362204	PFCMgmt(Ramirez).W&H	Case Anywhere, LLC	362204 PFCMgmt(Ramirez).W&H System Access Fee & Document ...	153.00	153.00
Bill	04/01/2025	374411	PFCMgmt(Ramirez).W&H	Case Anywhere, LLC	374411 PFCMgmt(Ramirez).W&H System Access Fee & Document ...	55.00	208.00
Bill	04/04/2025	387561	PFCMgmt(Ramirez).W&H	Case Anywhere, LLC	387561 PFCMgmt(Ramirez).W&H System Access Fee & Document ...	91.00	299.00
Bill	06/01/2025	399526	PFCMgmt(Ramirez).W&H	Case Anywhere, LLC	399526 PFCMgmt(Ramirez).W&H System Access Fee & Document ...	49.00	348.00
Bill	06/02/2025	411582	PFCMgmt(Ramirez).W&H	Case Anywhere, LLC	411582 PFCMgmt(Ramirez).W&H System Access Fee & Document ...	49.00	397.00
Credit C...	11/04/2024		PFCMgmt(Ramirez).W&H	Department of Industrial Relations	RM LWDA-CM-1059654-24 (255076) PFCMgmt(Ramirez).W&H	75.00	472.00
Total 502500 · Legal Expenses						472.00	472.00
502700 · Mediation Fees							
Bill	01/22/2025	PR45375	PFCMgmt(Ramirez).W&H	Signature Resolution, LLC	PR45375-PFCMgmt(Ramirez).W&H-50% Mediation Fees sked 02/0...	7,995.00	7,995.00
Total 502700 · Mediation Fees						7,995.00	7,995.00
503200 · Process Service Fees							
Bill	09/09/2024	81277	PFCMgmt(Ramirez).W&H	Valpro Attorney Services, LLC	81277-PFCMgmt(Ramirez).W&H-Servee PFC Management LLC-S&C	162.00	162.00
Total 503200 · Process Service Fees						162.00	162.00
503300 · Professional Fees							
Bill	02/20/2025	14370	PFCMgmt(Ramirez).W&H	Berger Consulting Group, LLC	14370 PFCMgmt(Ramirez).W&H-14.40 hours of work	7,920.00	7,920.00
Total 503300 · Professional Fees						7,920.00	7,920.00
Total 500000 · COS						18,292.06	18,292.06
TOTAL						18,292.06	18,292.06