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Attorney for Plaintiff Luis Franco and the Proposed Class

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Attorneys for Plaintiff ARIN ESRAELIAN, as an individual, and on behalf of all employees similarly situated (*Additional Plaintiff's Counsel listed on next page*)

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SANTA CLARA

Luis Franco, individually, on behalf of himself and
all other similarly situated employees,

Plaintiff,

vs.

The Goodyear Tire and Rubber Company, an Ohio
corporation, and Does 1-5

Defendants.

CASE NO.: 22CV393403

Consolidated with:

Esraelian Case No.: 21STCV44620 and

Rodas Case No.: 21STCV28702

CLASS ACTION

**DECLARATION OF JOHN A. YOUNG IN
SUPPORT OF PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Assigned for all purposes:

Honorable Patricia M. Lucas

Action filed: January 18, 2022

1 Luis Franco, individually, on behalf of himself
2 and all other similarly situated employees,

3 Plaintiff,

4 vs.

5 The Goodyear Tire and Rubber Company, an
6 Ohio corporation, and Does 1-5

7 Defendants.
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11 ARIN ESRAELIAN, as an individual, and on
12 behalf of all similarly situated employees,

13 Plaintiff,

14 v.

15 THE GOODYEAR TIRE & RUBBER
16 COMPANY, and DOES 1-50, inclusive,

17 Defendants.
18

19 DANIEL RODAS, as an individual and on behalf
20 of all others similarly situated,

21 Plaintiffs,

22 vs.

23 THE GOODYEAR TIRE & RUBBER
24 COMPANY, an Ohio corporation; and DOES 1
25 through 50, inclusive,

26 Defendants.
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ADDITIONAL PLAINTIFFS' COUNSEL

Larry W. Lee (State Bar No. 228175)
Max W. Gavron (State Bar No. 291697)
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ATTORNEY FOR PLAINTIFF ARIN ESRAELIAN

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1. I am an attorney duly admitted to practice law before the courts in the State of California. Unless otherwise specified, I have personal knowledge of the following facts, and if called as a witness, I could and would testify competently thereto, without intending to waive any attorney-client privilege.

3. This declaration is submitted in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, filed concurrently herewith.

4. I am a 2014 graduate of the Thomas Jefferson School of Law where I earned my Juris Doctor Degree. I have been a licensed practitioner since December 2014 and have been admitted to practice in the following courts: United States Central District Court, and all California State Courts.

6. As class counsel, I am qualified because I have over six years of experience in civil litigation matters, and am supervised by lead attorney Kevin Mahoney, who has extensive experience with class action employment litigation, as stated in his Declaration filed concurrently herewith.

8. During my employment at Mahoney law Group, APC, I have been involved in numerous wage and hour class and PAGA actions. Some examples of wage and hour class and PAGA action cases where I have, or am currently serving as lead and/or co-lead counsel include: *Alcala-Luna, et al. v. Me Gusta Gourmet Foods, Inc.*, Los Angeles Superior Court Case No. 21STCV19578; *Anaya, et al. v. Me Gusta Gourmet Foods, Inc.*, Bakersfield Superior Court Case No. BCV-22-101842; *Bran v. International Forklift*, Los Angeles Superior Court Case No. 19STCV03453; *Cambron-Garcia v. Mario's Tree Service, Inc.*, San Bernardino Superior Court Case No. CIVDS1927324; *Canizal-Tapia,*

1 *et al. v. QSI of California, LLC, et al.*, San Diego Superior Court Case No. 22CV-02486; *Cardenas v.*
2 *Global Specialties Direct Inc.*, Los Angeles Superior Court Case No. 19STCV03454; *Castro v. Silver*
3 *Creek Properties*, Ventura Superior Court Case No. 56-2019-00523447-CU-OE-VTA; *Garcia v. SCH*
4 *Whittier LLC*, Los Angeles Superior Court Case No. 19STCV03461; *Gomez, et al. v. Roadrunner*
5 *Transportation Services, LLC*, San Francisco Superior Court Case No. CGC-18-571755; *Guevara v.*
6 *Personnel Staffing Group, LLC, et al.* Superior Court of Riverside Case No. RIC1904864; *Honer v.*
7 *Barnes Solar, Inc.*, Los Angeles Superior Court Case No. 20SMCV01173; *Hunter v. DS Services of*
8 *America, LLC*, Los Angeles Superior Court Case No. 19STCV39110; *Jaramillo v. JVS Foods, Inc.*, Los
9 Angeles Superior Court Case No. 21TRCV00423; *Lewis v. McManga Foods, Inc.*, Riverside Superior
10 Court Case No. RIC1904964; *Lopez v. RPV Pancakes, Inc.*, Los Angeles Superior Court Case No.
11 19STCV46913; *Marron v. B.D.R. Industries, Inc.* Los Angeles Superior Court Case No. 19STCV35497;
12 *Mendoza v. GT's Living Foods, LLC*, Los Angeles Superior Court Case No. 19STCV43740; *Monzon v.*
13 *Channel Control Merchants of California, LLC*, Los Angeles Superior Court Case No. BC716443;
14 *Morales v. Fitness Alliance, LLC*, United States District Court, Central District of California, Eastern
15 District, Case No. 16-CV-02325; *Palacios Vasquez v. Lyneer Staffing, LLC*, Los Angeles Superior Court
16 Case No. 19STCV10628; *Portilla v. MYR Group, Inc. et al.*, San Bernardino Superior Court Case No.
17 CIVDS2005484; *Quinonez v. Consolidated Staffing Solutions, Inc.*, Los Angeles Superior Court Case
18 No. 18STCV04942; *Rojas v. Applied Composite Structures, Inc.*, Los Angeles Superior Court Case
19 19STCV04652; *Santos v. Amiluc Family, Inc.*, Los Angeles Superior Court Case No. 19STCV03707;
20 *Tellez v. Harvest Landscape Enterprises, Inc.*, United State District Court, Central District Case No.
21 2:19-cv-09015-GW-SK; *Trejo v. Lyneer Staffing Solutions, LLC*, Los Angeles Superior Court Case
22 19STCV10411.

22 9. As Mahoney Law Group, APC and the other firms representing Plaintiffs have been doing
23 throughout this case, we will continue to fulfill our responsibility to the Plaintiffs and the Proposed
24 Classes in this matter. We will continue to zealously prosecute this case.

25 10. Mahoney Law Group, APC's costs are approximately \$7,605.44. Attached hereto to this
26 declaration as Exhibit A is a true and correct copy of Mahoney Law Group, APC's itemized costs.
27 Declarant will provide a supplemental detailed cost bill along with the Final Approval Declaration to
28 verify said costs incurred and requested.

1 11. Mahoney Law Group, APC nor Plaintiffs have any conflicts of interest adverse to the class
2 that would prevent them from fairly and adequately protecting class interests through trial.

3 12. Mahoney Law Group, APC has no financial interest and/or ties to the Settlement
4 Administrator, Rust Consulting.

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

7 Executed this 1st day of December 2022 at Long Beach, California.

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11 JOHN A. YOUNG
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Exhibit A

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Experts JT CALCS INV# 220601 CK# 79065	BILLABLE	6/1/2022	\$925.00	\$925.00	1	MF
Online research WESTLAW RESEARCH ATTORNEY - J. YOUNG	BILLABLE	4/22/2022	\$9.21	\$9.21	1	AC
Arbitrators/mediators STEVE ROTTMAN - MEDIATION FEES INV# 4424 CK# PAID CC	BILLABLE	3/1/2022	\$5,000.00	\$5,000.00	1	MF
Court Processing Service Skyline Legal Services Ref# 78892 INV. #1202835-001: Esraelian v. The Goodyear Tire & Rubber Co.	BILLABLE	1/21/2022	\$65.00	\$65.00	1	JM
Electronic Service Provider ONE LEGAL - PROOF OF PERSONAL SERVICE INV# 17500610 CK# PAID CC	BILLABLE	1/11/2022	\$16.68	\$16.68	1	MF
Postage USPS-POSTAGE-WELCOME LETTER AND QUESTIONNAIRE	BILLABLE	12/9/2021	\$1.66	\$1.66	1	MF
Electronic Service Provider ONE LEGAL - COMPLAINT, CIVIL CASE COVER SHEET, ADDENDUM INV# 17340811 CK# PAID CC	BILLABLE	12/8/2021	\$1,494.01	\$1,494.01	1	MF

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Electronic Service Provider ONE LEGAL - COMPLAINT, SUMMONS, CIVIL CASE COVER SHEET INV# CK# PAID CC	BILLABLE	12/8/2021	\$12.35	\$12.35	1	MF
Other DOCUSIGN - JPA PAID CC	BILLABLE	12/1/2021	\$4.80	\$4.80	1	SM
Courtfees LWDA ONLINE -PAGA LETTER FEES ORDER# ORD-000143052 CK# PAID CC	BILLABLE	11/18/2021	\$75.00	\$75.00	1	MF
Online research WESTLAW RESEARCH ATTORNEY - L. THERIAULT	BILLABLE	10/4/2021	\$1.73	\$1.73	1	AC
				\$7,605.44 USD		