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LAW OFFICES OF SAHAG MAJARIAN II

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Attorneys for Plaintiff Becerra and the Proposed Class
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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

STEPHEN BROUGH and EDGAR
BECERRA, individuals, on behalf of
themselves and others similarly situated,

PLAINTIFFS,

v.

GLOBAL PARATRANSIT, INC.; REZA
NASROLLAHY, an individual; and DOES 1
to 50, inclusive,

DEFENDANTS.

Case No. BC616177; *Related Case* BC619163
[Case Assigned for All Purposes to Hon.
Carolyn B. Kuhl]

**DECLARATION OF SAHAG MAJARIAN
IN SUPPORT OF FINAL APPROVAL OF
CLASS SETTLEMENT**

Date: November 12, 2019
Time: 10:00 a.m.
Dept.: SSC - 12

Trial Date: None Set
Complaint Filed: April 7, 2016

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Attorneys for Plaintiff Brough and the Proposed Class

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DECLARATION OF SAHAG MAJARIAN II

I, Sahag Majarian II, hereby declare:

1. I am an attorney duly licensed to practice in the State of California and am the principal of the Law Offices of Sahag Majarian II, one of the attorneys of record for Plaintiffs Edgar Becerra and the class against Defendants. I have personal knowledge of the following, and if called and sworn as a witness, I could and would competently testify thereto. This declaration is made in support of Plaintiffs' motion for final approval of the class action settlement and award of attorneys' fees and costs pursuant to the class action settlement in this case.

2. I graduated from Loyola Law School in 1990. Since my graduation, I have been in private practice primarily representing consumers against insurance companies and workers against their employers. I have devoted a significant portion of my practice to employment law and class actions, and have been appointed co-class counsel for the plaintiffs in no less than 50 wage and hour class actions. A sample of these cases are: *Ayvasi v. Ralph Grocery Company*, LASC Case No. BC382980; *Sandoval v. Chevron Stations, Inc.*, MCSC Case No. CV061690; *Nieves v. Roy's Woldwide, Inc.*, OSCS Case No. 06CC0076; *Corado v. Good Year Rubber Corp.*, SBSC Case No. RCV095476; *Pleitz v. Johnson Controls*, LASC Case No. BC353315; *Serrano v. BCI Coca Cola Bottling Co. of LA*, LASC Case No. BC349904; *Urbina v. Valley Crest Co.*, LASC Case No. BC356023; *Moraza v. OK International*, OSCS Case No. 06CC0148; *DeLuna v. Target*, LASC Case No. BC353080; *Daglian v. Staples, Inc.* LASC Case No. BC375325; *McCoy v. Kimko*, OSCS Case No. 07CC00007; *Razo v. C&D Zodiac, Inc.*, OSCS Case No. 07CC01373; and *Gomez v. Spenuzza, Inc.*, RCSC Case No. RIC524075.

3. In the employment class action arena, I have participated in over 150 class action mediations. My participation has included extensive preparation, development of thorough knowledge of the legal issues related to certification and liability, and full immersion and participation in the mediation and negotiation process. I have also been designated co-counsel in various cases where we prevailed in contested class certification motions. The cases include: *Herrera v. Mountain Meadow Mushroom Farms*, SDSC Case No. 37-2009-00092416; *Aguirre v.*

1 *California Drop Forge, Inc.*, LASC Case No. BC374521; *Marroquin v. Swissport North*
2 *America, Inc.*, LASC Case No. BC390001; *Ruiz v. JCP Logistics, Inc.*, USDC Central District
3 Case No. 8:13-cv1908-JLS-AN.

4 4. Throughout my thirty year career in law, my practice has been exclusively
5 contingent fee work. Within the class action arena, I have been designated co-class counsel in no
6 less than 30 class actions that have been settled for over \$1 million each. Given my success and
7 experience, in my contingency fee practice I have averaged over \$700 per hour worked.
8 Therefore, I believe it appropriate to set my lodestar at no less than \$700 per hour in this case.
9 This request is fair in view of the much higher rate per hour that can be justified by the broadly
10 accepted Laffey Matrix which shows hourly rate of \$899 for attorneys out of law school for more
11 than 20 years. Within the last three years, various courts throughout the State of California have
12 approved my hourly rate at \$700.

13 5. My involvement in this case has included analysis and research relative to Labor
14 Code violations as to the employment practices of Defendants. In the process, I developed a
15 thorough knowledge of the legal issues surrounding the facts of this case. In addition, I was
16 involved in investigating and solidifying out theories of liability against Defendants as well as
17 formulating an exposure analysis for the violations asserted in this case. The settlement was
18 reached after extensive negotiations subsequent to two full days of mediation with two
19 experienced mediators, namely retired Los Angeles Superior Court Judge Peter Lichtman and
20 retired Orange County Superior Court Judge Gail Andler. Based on the totality of the
21 circumstances, I believe that the result achieved in this case is an extremely good outcome for all
22 class members.

23 6. Based on my experience as Class Counsel in previous cases, and given the legal
24 and factual realities presented in this case, I believe the proposed settlement is fair, reasonable
25 and adequate for the class. As a result of my prior experience of representing employees in other
26 class actions, I am fully aware of the responsibilities I owe to the aggrieved employees.

27 7. I was approached by Plaintiff Edgar Becerra in January of 2016 in connection
28 with potential employment law claims he believed he may have had against Defendants. After

1 conducting an investigation of the facts and data, my co-counsel Eric B. Kingsley of Kingsley &
2 Kingsley, APC and I decided to proceed with filing of the instance class action against
3 Defendants.

4 8. Throughout the past forty five months, I have been involved in the handling of
5 this matter at times more active than others. My work in this case includes, but is not limited to
6 pre-litigation research and investigation regarding Defendant's employment practices,
7 communication with client, legal research, and communication with co-counsel regarding
8 implementation of a strategy to move the case towards resolution.

9 9. My law office, along the law firm of Kingsley & Kingsley, APC undertook this
10 matter on a purely contingency basis with no guarantee that the time expended would result in
11 any recovery or recoupment of costs. Throughout my 45 months of involvement in this matter, I
12 have spent a total of 10.40 hours in this case (See Exhibit "A"). I anticipate spending 2
13 additional hours on this case up to conclusion of the case and closure of the file. Based upon my
14 rate of \$700 per hour, without taking account the additional two hours of anticipated work, my
15 unadjusted lodestar amount would be for \$7,280. I have incurred a total of \$1,562.37 in costs in
16 this case (See Exhibit "B").

17 10. Based on my experience in class and representative litigation, as well as my
18 experience with similar class cases involving the settlement and amount being made available
19 provides class members of aggrieved employees with a real and significant benefit. My
20 endorsement of the Settlement is without reservation.

21
22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct.

24
25 Executed on October 15, 2019 at Tarzana, California.

26
27 
28 Sahag Majarian II

EXHIBIT A

LAW OFFICES OF

SAHAG MAJARIAN II

A PROFESSIONAL CORPORATION

18250 VENTURA BOULEVARD
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October 15, 2019

LEGAL SERVICES

Re: BECERRA V. GLOBAL PARATRANSIT

1/21/16	Client intake	1.10 hours
1/25/16	Draft letter to Global Paratransit	0.30 hours
1/31/16	Analyze records from client; Research Corporate entity	1.60 hours
2/11/16	Review letter from defense counsel	0.20 hours
2/28/16	Review letter from defense counsel	0.10 hours
3/20/16	Analyze records from Global Paratransit	1.00 hours
3/21/16	Draft email to co-counsel	0.50 hours
3/23/16	Draft email to co-counsel	0.10 hours
3/28/16	Email from and to co-counsel; Prepare for and TC with client and co-counsel	1.10 hours
4/13/16	Review arbitration agreement	0.40 hours
5/4/16	Review email from co-counsel	0.20 hours
12/8/16	Review discovery responses	0.80 hours
7/28/17	Draft email to co-counsel re mediation; Review draft mediation brief	0.70 hours
8/4/17	Multiple emails with co-counsel re Mediation	0.50 hours
8/14/17	Review mediator's proposal	0.20 hours

8/31/18	Interview potential witness; Draft email To co-counsel	0.30 hours
11/5/18	Draft email to staff re 2nd mediation	0.10 hours
10/15/19	Draft declaration for final approval	1.20 hours

Total Hours: 10.40

Hourly Rate: \$ 700.00

Total Costs: \$ 1,562.37

EXHIBIT B

[illegible]