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*Attorneys for Plaintiff*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF VENTURA**

ERIC ZARAGOZA, individually, and on behalf of other members of the general public similarly situated,

Plaintiffs,

vs.

THE ARC OF VENTURA COUNTY, INC., a California corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 56-2022-00565343-CU-OE-VTA

Honorable Jeffrey G. Bennett  
Department 21

**CLASS ACTION**

**DECLARATION OF YASMIN HOSSEINI IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**

Date: August 10, 2023  
Time: 8:30 a.m.  
Dept.: 21

Complaint Filed: May 5, 2022  
Trial Date: None Set

Ventura Superior Court Accepted through eDelivery submitted 07-17-2023 at 08:37:13 AM

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1 **DECLARATION OF YASMIN HOSSEINI**

2 I, Yasmin Hosseini, hereby declare as follows:

3 1. I am an attorney licensed to practice law in the State of California. I am a member  
4 of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Eric Zaragoza (“Plaintiff”) in the  
5 above-captioned action. The facts set forth in this declaration are within my personal knowledge  
6 or based on information and belief, and, if called as a witness, I could and would competently  
7 testify thereto.

8 **EXPERIENCE AND ADEQUACY OF LAWYERS *for* JUSTICE, PC**

9 ***EDUCATION***

10 2. Since October 2008, Lawyers *for* Justice, PC has almost exclusively focused on the  
11 prosecution of consumer and employment class actions, involving wage-and-hour claims, race  
12 discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC  
13 is attorney of record in well over a dozen employment-related putative class actions in both state  
14 and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys  
15 who focus on litigating complex wage-and-hour class and Private Attorneys General Act  
16 (“PAGA”) representative actions. The firm has successfully litigated cases involving the  
17 executive, administrative, and other overtime exemptions to the State of California and federal  
18 overtime compensation requirements. During a relatively short time, in association with other law  
19 firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of  
20 individuals in California.

21 3. Edwin Aiwazian is the Managing Member and Shareholder of Lawyers *for* Justice,  
22 PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and  
23 earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has  
24 extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute  
25 Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has  
26 previously served as a pro bono mediator for the Los Angeles County Superior Court. In October  
27 of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During  
28 the summer of 2000, he studied Legal Writing at Harvard University. From approximately

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1 September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable  
2 Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From  
3 approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the  
4 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.  
5 In December of 2004, he obtained a license to practice law from the California State Bar. From  
6 approximately December 2004 to approximately August 2008, he was employed by a prominent  
7 plaintiff-side law firm. At the prominent plaintiff-side law firm, his practice focused on class  
8 actions and other complex cases involving toxic torts and products liability. In addition, he gained  
9 substantial experience on cases involving insurance bad faith, premises liability, and medical  
10 negligence. While employed by the prominent plaintiff-side law firm, he argued approximately  
11 one hundred (100) motions, took or defended approximately one hundred fifty (150) depositions,  
12 and prepared dozens of expert witnesses for deposition or trial. Since in or around October of  
13 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the  
14 prosecution of consumer and employment class actions, involving wage-and-hour claims, race  
15 discrimination, unfair business practices, or consumer fraud. While employed by Lawyers *for*  
16 Justice PC, he has argued over one hundred (100) motions, taken or defended over one hundred  
17 fifty (150) depositions, prepared dozens of expert witnesses for deposition or trial, and attended  
18 over one hundred seventy-five (175) mediations. Together with other attorneys at the firm, and in  
19 many cases in conjunction with co-counsel, he has successfully litigated cases involving the  
20 executive, administrative, and other overtime exemptions to the State of California and federal  
21 overtime compensation requirements. Under his supervision, Lawyers *for* Justice, PC has  
22 successfully obtained class certification by contested motion practice in approximately fifteen (15)  
23 cases in the last decade and litigated over 1,000 class action or representative action cases.

24 4. Arby Aiwazian is a Member and Shareholder of Lawyers *for* Justice, PC. He  
25 received his Bachelor of Arts degree from University of California, Los Angeles and graduated  
26 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.  
27 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the  
28 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.

1 From approximately August 2008 to approximately December 2008, he served as a Judicial Extern  
2 to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the Ninth Circuit.  
3 He was admitted to practice law in California in 2010. He is admitted to practice before all courts  
4 of the State of California and all United States District Courts in the State of California. He has  
5 worked on many wage-and-hour class action and representative action cases, taking the lead in  
6 taking and defending depositions, arguing motions, and attending mediations. He has played an  
7 integral role in preparing matters for class certification, including and not limited to, successful  
8 certification of a class in *Upson v. Sur La Table* (Los Angeles County Superior Court Case No.  
9 BC424012), *Montazemi v. Regus Management* (Los Angeles County Superior Court Case No.  
10 BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County Superior Court Case No.  
11 RG13680477). He has worked on over one hundred (100) class action or representative action  
12 cases which have resulted in settlement and been granted court approval, including, but not limited  
13 to, those listed in paragraph 7 herein.

14 5. Joanna Ghosh is a Senior Member of Lawyers for Justice, PC. She received a  
15 Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of  
16 Science degree from the London School of Economics in 2007, and a Juris Doctor degree from  
17 Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010)  
18 and in New York (since 2013) and is also admitted to practice in all U.S. District Courts in  
19 California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme  
20 Court. She has taken and defended dozens of depositions and successfully handled motion practice  
21 in class action cases regarding discovery (including and not limited to, regarding class contact  
22 information), class certification (both contested class certification and stipulated class  
23 certification), arbitration agreements, coordination, and intervention. She has successfully  
24 handled briefing and oral argument on appeal and obtained notable decisions regarding the Private  
25 Attorneys General Act and employer efforts to compel arbitration, e.g., *Betancourt v. Prudential*  
26 *Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017),  
27 cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th175. She has  
28 significant experience with class actions, including and not limited to working on cases to obtain

1 class certification through contested motion practice and working on cases in the post-certification  
2 stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial  
3 preparation in conjunction with co-counsel in a case involving a certified class consisting of  
4 approximately 2,600 individuals). She also has extensive experience with class action and/or  
5 representative action settlements, and have handled this process in over three hundred (300) cases.  
6 Under her, Edwin Aiwazian, and Arby Aiwazian’s supervision, the firm has handled the class  
7 certification and court approval process for hundreds of class action and/or representative action  
8 matters that have successfully resolved. She is a member of the California Employment Lawyers  
9 Association.

10 6. I am a Member of Lawyers *for* Justice, PC. I received my Bachelor of Arts degree  
11 from University of California, Santa Barbara in 2013 and earned my Juris Doctor degree from  
12 Pepperdine University School of Law in 2017. I was admitted to practice law in California in  
13 2019. I am admitted to practice before all courts of the State of California and all federal district  
14 courts in the State of California. I have worked on many wage and hour class action and PAGA  
15 representative matters, and my work has included, *inter alia*, researching and drafting pleadings,  
16 administrative notice exhaustion, drafting, negotiating, and finalizing stipulations and settlement  
17 agreements, engaging in motion practice, claims evaluation and analysis, and making court  
18 appearances. Prior to working at Lawyers *for* Justice, PC, I was an attorney at a prominent  
19 boutique entertainment law firm, where I represented filmmakers and talent, negotiating and  
20 structuring various types of agreements on their behalf. I am a member of the California  
21 Employment Lawyers Association, Beverly Hills Bar Association, and Iranian American Bar  
22 Association.

23 ***EXAMPLES OF RESULTS IN WAGE-AND-HOUR CLASS ACTION AND***  
24 ***REPRESENTATIVE ACTION CASES***

25 7. What follows are just a few examples of the type of results Lawyers *for* Justice, PC  
26 (“LFJ”) has achieved on behalf of its clients:

27 a) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
28 wage-and-hour class action against a major property management company involving allegations

1 of misclassification of various “manager” positions. On September 20, 2010, the court granted  
2 final approval of the class action settlement. The Los Angeles County Superior Court Case  
3 Number is BC400414.

4 b) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
5 wage-and-hour class action against a national retailer of household items involving allegations of  
6 misclassification of the “Assistant Store Manager” position. On October 28, 2010, the court  
7 granted final approval of the class action settlement. The Los Angeles County Superior Court  
8 Case Number is BC413498.

9 c) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
10 wage-and-hour class action against a national property management company involving  
11 allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court  
12 granted final approval of the class action settlement. The Los Angeles County Superior Court  
13 Case Number is BC430918.

14 d) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
15 wage-and-hour class action against a national retailer involving allegations of misclassification of  
16 the “Store Manager” position. On June 10, 2011, the court granted plaintiffs’ motion for class  
17 certification. On August 26, 2013, the court granted final approval of the class action settlement.  
18 The Los Angeles County Superior Court Case Number is BC424012.

19 e) LFJ, in association with co-counsel therein, represented the plaintiff in a  
20 wage-and-hour class and PAGA representative action against a bank, involving allegations of  
21 misclassification of the “Assistant Branch Manager” position. On August 27, 2013, the court  
22 granted final approval of the class and PAGA representative action settlement. The Kern County  
23 Superior Court Case Number is S-1500-CV-273194-LHB.

24 f) LFJ, in association with co-counsel therein, represented the plaintiff in a  
25 wage-and-hour class and PAGA representative action against a national wholesale distributor of  
26 plumbing and builder supplies, involving allegations of misclassification of multiple salaried  
27 “manager” positions. On May 22, 2014, the court granted final approval of the class and PAGA  
28 representative action settlement. The Sacramento County Superior Court Case Number is 34-

1 2012-00136285.

2 g) LFJ, in association with co-counsel therein, represented the plaintiff in a  
3 wage-and-hour class action against a multinational corporation that provides global workplace  
4 solutions, involving allegations of misclassification of the “Operations Manager” position. On  
5 September 16, 2014, the court granted plaintiff’s motion for class certification. The Los Angeles  
6 County Superior Court Case Number is BC478769.

7 h) LFJ, in association with co-counsel therein, represented the plaintiff in a  
8 wage-and-hour class and PAGA representative action against a national retailer of household  
9 items, on behalf of hourly-paid or non-exempt employees. On May 27, 2015, the court granted  
10 final approval of the class and PAGA representative action settlement. The San Francisco County  
11 Superior Court Case Number is CGC-13-532344.

12 i) LFJ, in association with co-counsel therein, represented the plaintiff in a  
13 wage-and-hour class and PAGA representative action involving allegations of misclassification of  
14 the salaried residential “Property Manager” position. On September 17, 2015, the court granted  
15 plaintiff’s motion for class certification. On October 20, 2017, the court granted final approval of  
16 the class and PAGA representative action settlement. The Los Angeles County Superior Court  
17 Case Number is BC474784.

18 j) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
19 wage-and-hour class and PAGA representative action against a national retailer of upscale  
20 hardware and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the court  
21 granted final approval of the class and PAGA representative action settlement. The Los Angeles  
22 County Superior Court Case Numbers are BC516795 and JCCP4794, and the Judicial Council  
23 Coordination Proceeding Number is 4794.

24 k) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
25 wage-and-hour class action against a national retailer of apparel and fashion accessories, on behalf  
26 of non-exempt employees. On August 5, 2016, the court granted final approval of the class action  
27 settlement. The Los Angeles County Superior Court Case Number is BC488069.

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1           l)     LFJ, in association with co-counsel therein, represented the plaintiffs in a  
2 wage-and-hour class action against a national retailer of apparel, accessories, and home products,  
3 involving allegations of misclassification of the “Department Manager” position. On August 12,  
4 2016, the court granted the plaintiffs’ motion for class certification in part and certified a class. On  
5 August 6, 2019, the court granted final approval of the class action settlement. The Alameda  
6 County Superior Court Case Number is RG13680477.

7           m)     LFJ represented the plaintiff in a PAGA representative action against a real  
8 estate and property management company, on behalf of non-exempt employees. On November 4,  
9 2016, the court granted approval of the PAGA representative action settlement. The Orange  
10 County Superior Court Case Number is 30-2015-00775439-CU-OE-CXC.

11           n)     LFJ, in association with co-counsel therein, represented the plaintiffs in a  
12 wage-and-hour class and PAGA representative action against a full-service bank, on behalf of non-  
13 exempt employees. On November 18, 2016, the court granted final approval of the class and  
14 PAGA representative action settlement. The San Francisco County Superior Court Case Number  
15 is CJC-13-004839 and the Judicial Council Coordination Proceeding Number is 4839.

16           o)     LFJ represented the plaintiffs in a wage-and-hour class and PAGA  
17 representative action against a foodservice distributor, on behalf of non-exempt employees. On  
18 January 26, 2017, the court granted final approval of the class and PAGA representative action  
19 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

20           p)     LFJ, on behalf of the plaintiff and respondent in a PAGA representative  
21 action, successfully opposed in the trial court, and briefed and argued an appeal with respect to the  
22 employer’s motion to compel arbitration, which resulted in a published opinion by the California  
23 Court of Appeal in favor of employees. *Roberto Betancourt v. Prudential Overall Supply* (Cal.  
24 App. 4th Dist., Mar. 7, 2017) 9 Cal.App.5th 439, *review denied, cert. denied* (U.S. Supreme Court  
25 Docket No. 17-254). The Riverside County Superior Court Case Numbers are RIC1503952 and  
26 RICJCCP5046, and the Judicial Council Coordination Proceeding Number is 5046.

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1 q) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
2 wage-and-hour class and PAGA representative action against a consumer packaging company, on  
3 behalf of non-exempt employees. On March 10, 2017, the court granted final approval of the class  
4 and PAGA representative action settlement. The Los Angeles County Superior Court Case  
5 Number is BC590429.

6 r) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
7 wage-and-hour class and PAGA representative action against a manufacturer of food service  
8 industry supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final  
9 approval of the class and PAGA representative action settlement. The Orange County Superior  
10 Court Case Number is 30-2015-00810013-CU-OE-CXC.

11 s) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
12 wage-and-hour class and PAGA representative action against a lumber and hardware company on  
13 behalf of non-exempt employees. On April 26, 2017, the court granted final approval of the class  
14 and PAGA representative action settlement. The Orange County Superior Court Case Number is  
15 30-2014-00747750-CU-OE-CXC.

16 t) LFJ represented the plaintiff in a wage-and-hour class and PAGA  
17 representative action against a property management company, on behalf of non-exempt  
18 employees. On June 14, 2017, the court granted final approval of the class and PAGA  
19 representative action settlement. The Los Angeles County Superior Court Case Number is  
20 BC586234.

21 u) LFJ represented the plaintiff in a wage-and-hour class and PAGA  
22 representative action against a food company on behalf of non-exempt employees. On June 30,  
23 2017, the court granted final approval of the class and PAGA representative action settlement. The  
24 Sacramento County Superior Court Case Number is 34-2015-00175871.

25 v) LFJ represented the plaintiffs in a wage-and-hour class and PAGA  
26 representative action against a chocolate company on behalf of non-exempt employees. On July  
27 19, 2017, the court granted final approval of the class and PAGA representative action settlement.  
28 The Alameda County Superior Court Case Number is RG15764300.

1 w) LFJ represented the plaintiff in a PAGA representative action, against the  
2 parent company of several restaurants, on behalf of hourly-paid, non-exempt employees. On  
3 October 18, 2017, the court granted approval of the PAGA representative action settlement. The  
4 Los Angeles County Superior Court Case Number is BC569664.

5 x) LFJ represented the plaintiffs in a wage-and-hour class and PAGA  
6 representative action against a manufacturer of plastic containers on behalf of non-exempt  
7 employees. On October 31, 2017, the court granted final approval of the class and PAGA  
8 representative action settlement. The Los Angeles County Superior Court Case Number is  
9 BC577233.

10 y) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
11 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt  
12 employees. On December 11, 2017, the court granted final approval of the class and PAGA  
13 representative action settlement. The Los Angeles County Superior Court Case Number is  
14 BC569646.

15 z) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
16 wage-and-hour class and PAGA representative action against a property management company  
17 on behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court granted final  
18 approval of the class and PAGA representative action settlement. The Los Angeles County  
19 Superior Court Case Number is JCCP4819 and the Judicial Council Coordination Proceeding  
20 Number is 4819.

21 aa) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
22 wage-and-hour class and PAGA representative action against a global provider of flexible office  
23 space solutions. On February 15, 2018, the court granted final approval of the class and PAGA  
24 representative action settlement. The Los Angeles County Superior Court Case Number is  
25 BC498401.

26 bb) LFJ, in association with co-counsel therein, represents the plaintiff in a  
27 wage-and-hour class action against a container manufacturer, on behalf of non-exempt employees.  
28 On October 15, 2018, the court granted the plaintiff's motion for class certification. The Tulare

1 County Superior Court Case Number is VCU264528.

2 cc) LFJ represented the plaintiffs in a wage-and-hour class and PAGA  
3 representative action against a behavioral health service provider on behalf of non-exempt  
4 employees. On November 13, 2018, the court granted final approval of the class and PAGA  
5 representative action settlement. The Alameda County Superior Court Case Number is  
6 RG16811450.

7 dd) LFJ, in association with co-counsel therein, represented the plaintiff in a  
8 PAGA representative action against a global provider of products and services to the energy  
9 industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the court  
10 granted approval of the PAGA representative action settlement. The Kern County Superior Court  
11 Case Number is S-1500-CV-280215-SDC.

12 ee) LFJ, in association with co-counsel therein, represents the plaintiff in a  
13 wage-and-hour class action against a parking company on behalf of non-exempt employees. On  
14 September 3, 2019, the court granted the plaintiff's motion for class certification and certified a  
15 class. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial  
16 Council Coordination Proceeding Number is 4886.

17 ff) LFJ, in association with co-counsel therein, represents the plaintiffs in a  
18 wage-and-hour class and PAGA representative action against a bank on behalf of non-exempt  
19 employees. On September 27, 2019, the court granted the plaintiffs' motion for class certification  
20 in part and certified a class. The Alameda County Superior Court Case Number is RG15757606  
21 and the Judicial Council Coordination Proceeding Number is 4921.

22 gg) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
23 wage-and-hour class and PAGA representative action against a national retailer of apparel and  
24 fashion accessories, on behalf of non-exempt employees. On October 9, 2019, the court granted  
25 the plaintiffs' motion for class certification in part and certified a class. On May 14, 2021, the  
26 court granted final approval of the class and PAGA representative action settlement. The  
27 Sacramento County Superior Court Case Number is 34-2015-00175330-CU-OE-GDS.

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1           hh) LFJ, in association with co-counsel therein, represents the plaintiff in a  
2 wage-and-hour class and PAGA representative action against a medical equipment supplier on  
3 behalf of non-exempt employees. On February 13, 2020, the court granted the plaintiff's motion  
4 for class certification and certified a class. The San Bernardino County Superior Court Case  
5 Number is CIVDS1505744.

6           ii) LFJ, in association with co-counsel therein, on behalf of the plaintiff and  
7 respondent in a PAGA representative action, successfully opposed in the trial court, and briefed  
8 and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a  
9 notable decision from the California Supreme Court clarifying the law regarding PAGA claims,  
10 *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. On February 21, 2020, the court granted approval  
11 of the PAGA representative action settlement. The San Diego County Superior Court Case  
12 Number is 34-2015-00175330.

13           jj) LFJ, in association with co-counsel therein, represented the plaintiff in a  
14 wage-and-hour class and PAGA representative action against a large national drug testing  
15 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the  
16 plaintiff's motion for class certification and certified a class. On October 28, 2022, the court  
17 granted final approval of the class and PAGA representative action settlement. The San Diego  
18 County Superior Court Case Number is 37-2018-00019611-CU-OE-CTL.

19           kk) LFJ, in association with co-counsel therein, represents the plaintiffs in a  
20 wage-and-hour class and PAGA representative action against a national retailer of sportswear,  
21 footwear, and camping equipment on behalf of non-exempt employees. On March 16, 2020, the  
22 court granted in part the plaintiff's motion for class certification and certified a class. The  
23 Riverside County Superior Court Case Numbers are RIC1507504 and RICJCCP4930, and the  
24 Judicial Council Coordination Proceeding Number is 4930.

25           ll) LFJ, in association with co-counsel therein, represented the plaintiffs in a  
26 wage-and-hour class action against manufacturer and supplier of power products and services on  
27 behalf of non-exempt employees. On July 31, 2020, the court granted in part the plaintiffs' motion  
28 for class certification and certified a class. On August 27, 2021, the court granted final approval

1 of the class action settlement. The San Diego County Superior Court Case Number is 37-2015-  
2 00025968-CU-OE-CTL.

3 mm) LFJ represents the plaintiff in a wage-and-hour class action against a  
4 nutritional products manufacturer on behalf of non-exempt production line employees. On  
5 December 13, 2021, the court granted the plaintiff’s motion for class certification in part and  
6 certified a class. The Solano County Superior Court Case Number is FCS051001.

7 **SUMMARY OF WORK PERFORMED**

8 8. Lawyers *for Justice*, PC has been actively engaged in the litigation of this matter  
9 since its inception and throughout the pendency of this matter.

10 9. This case was commenced on May 5, 2022, and on September 16, 2022, Parker &  
11 Minne, LLP was associated as co-counsel for Plaintiff. Since joining forces with Parker & Minne,  
12 LLP, we have worked cooperatively with them to strategize and prosecute the case, and our work  
13 with them has been a coordinated and combined effort. Together, Lawyers *for Justice*, PC and  
14 Parker & Minne, LLP are referred to as “Class Counsel.”

15 10. Before initiating the lawsuit on behalf of Plaintiff, Lawyers *for Justice*, PC  
16 conducted extensive investigation and research into the facts and circumstances underlying the  
17 pertinent factual and legal issues and applicable law. This required thorough discussions and  
18 interviews between attorneys at our firm and Plaintiff, and research into the various legal issues  
19 involved in the case, namely, the current state of the law as it applied to class certification, off-  
20 the-clock theory, meal and rest periods, wage-and-hour enforcement, PAGA representative claims,  
21 Plaintiff’s claims and damages, and Defendant’s defenses. After conducting initial investigation,  
22 our firm determined that Plaintiff’s claims were well-suited for class action treatment and  
23 representative adjudication owing to what appeared to be a common course of conduct affecting a  
24 similarly situated group of current and former hourly-paid, non-exempt employees who worked  
25 for Defendant The Arc of Ventura County, Inc. (“Defendant”) within the State of California, who  
26 were not properly compensated for, *inter alia*, all hours worked, non-compliant meal and rest  
27 periods, and unreimbursed business expenses.

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Ventura Superior Court Accepted through eDelivery submitted 07-17-2023 at 08:37:13 AM

**LAWYERS for JUSTICE, PC**

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1           11. Collectively, Class Counsel investigated the veracity, strength, and scope of the  
2 claims, and worked on preparing the case for class certification and trial, prior to reaching the  
3 Settlement. This matter has involved extensive and ongoing investigations, research into legal and  
4 factual issues, informal discovery, and court proceedings. Class Counsel obtained information,  
5 documents, and data in the course of litigation and in connection with mediation and settlement  
6 negotiations. Class Counsel reviewed and analyzed a volume of information, documents, and data  
7 obtained from Plaintiff, Defendant, and other sources, researched applicable law, and undertook  
8 analyses and calculations of the value of claims, damages, and penalties exposure. Class Counsel  
9 also met and conferred with Defendant’s counsel on numerous occasions, e.g., to discuss issues  
10 relating to the pleadings, case management, production of information, documents, and data in the  
11 course of litigation and mediation and settlement negotiations, and mediation and settlement  
12 negotiations. Other work that Class Counsel has performed includes, and is not limited to, case  
13 strategy and analysis; drafting, reviewing, and revising the pleadings and motion-related papers;  
14 claims assessment and evaluation; and preparing for and attending mediation and settlement  
15 negotiations.

16           12. As outlined herein, the parties have conducted significant investigations and  
17 exchange, review, and analysis of a volume of information, documents, and data obtained from  
18 Plaintiff, Defendant, and other sources during the course of litigating the case and in connection  
19 with mediation and settlement negotiations. This information, documents, and data provided a  
20 critical understanding of the nature of the work performed by putative class members and  
21 aggrieved employees, as well as Defendant’s operations and employment policies, practices, and  
22 procedures, and were used in analyzing liability, damages, and penalties valuation issues in  
23 connection with all phases of the litigation, and ultimately, in connection with the mediation and  
24 settlement negotiation process. Accordingly, sufficient investigation and review of information  
25 has taken place in order for the parties to be sufficiently informed of the nature and extent of the  
26 claims, and to enable all parties to fully evaluate the Settlement for its fairness, adequacy, and  
27 reasonableness.

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1           13. After conducting significant investigation of the facts and law during the prosecution  
2 of the case, counsel for the parties engaged in mediation and extensive settlement negotiations to  
3 try to resolve the case. These efforts included participating in mediation conducted by Paul  
4 Grossman, Esq., a well-regarded mediator who is experienced in mediating complex labor and  
5 employment matters, on April 18, 2023. During all settlement discussions, the parties conducted  
6 their negotiations at arm’s length in an adversarial position. In the course of mediation and  
7 settlement negotiations, the parties discussed and considered all aspects of the case, including the  
8 risks and delays of further litigation, the risks to the parties of proceeding with class certification,  
9 and/or trial, the law relating to class certification, off-the-clock theory, meal and rest periods,  
10 regular rate, PAGA representative claims, and wage-and-hour enforcement, as well as the  
11 evidence produced and analyzed, and the possibility of appeals, among other things. Arriving at  
12 a settlement that was acceptable to the parties was not easy. After conducting extensive  
13 investigations and settlement negotiations, and with the aid of the mediator’s evaluation, the  
14 parties have agreed to resolve the case given the legal issues relating to Plaintiff’s principal claims,  
15 as well as the costs and risks to both sides that would attend further litigation, and the real  
16 possibility of no recovery after years of litigation.

17           14. The Settlement provides for an Enhancement Award in an amount not to exceed Ten  
18 Thousand Dollars and Zero Cents (\$10,000.00) for Plaintiff. The contemplated enhancement  
19 award is fair and appropriate in light of the time and effort that Plaintiff expended to pursue the  
20 case. Plaintiff was available whenever Class Counsel needed him, actively tried to obtain and  
21 provide information, and spent a substantial amount of time and effort providing the facts and  
22 evidence necessary to facilitate prosecution of the case. Accordingly, it is appropriate and just for  
23 Plaintiff to receive a reasonable enhancement award for his services in the case, in addition to his  
24 individual settlement payment under the Settlement.

25           15. After making reasonable inquiry, I am not aware of any currently pending class,  
26 representative, or other collective action that asserts claims against Defendant that are similar to  
27 those asserted in the above-captioned action being settled.


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16. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interests of Plaintiff, other Class Members, the State of California, and PAGA Members.

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

Executed on this 13 day of July 2023, at Glendale, California.



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Yasmin Hosseini