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 Superior Court of California,
 County of Los Angeles
 12/18/2023 1:00 PM
 David W. Slayton,
 Executive Officer/Clerk of Court,
 By R. Lozano, Deputy Clerk

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10 Attorneys for PLAINTIFF
 JUAN NAVARRO on behalf of himself and others
 11 similarly situated.

12
 13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
 14 **FOR THE COUNTY OF LOS ANGELES**

15 JUAN NAVARRO on behalf of himself and
 16 others similarly situated.

Case No.: BC683876

17 **PLAINTIFF,**

CLASS ACTION

18 vs.

**DECLARATION OF SAHAG MAJARIAN
 II IN SUPPORT OF PLAINTIFF'S
 MOTION FOR FINAL APPROVAL OF
 CLASS ACTION SETTLEMENT**

19 L.A. SOUTHPARK HIGH-RISE, LP, a limited
 20 partnership; and DOES 1 to 100, Inclusive.

21 **DEFENDANTS.**

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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 Plaintiff Juan Navarro in this action against Defendant. 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 final approval of 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 , class actions and actions brought under the Private Attorneys General Act (PAGA), and have been appointed co-class counsel for the plaintiffs in no less than 300 wage and hour class and PAGA actions. A sample of these cases are: *Ayvazi v. Ralph Grocery Company*, LASC Case No. BC 382980; *Sandoval vs. Chevron Stations, Inc.*, MCSC Case No. CV 061690; *Nieves v. Roy's Worldwide, Inc.*, OCSC Case No. 06CC0076; *Corado v. Good Year Rubber Corp.*, SBSC Case No. RCV095476; *Pleitez v. Johnson Controls*, LASC Case No. BC353315; *Serrano v. BCI Coca Cola Bottling Co. of L.A.*, LASC Case No. BC349904; *Urbina v. Valley Crest Co.*, LASC Case No. BC356023; *Moraza v. OK International*, OCSC Case No. 06CC0148; *DeLuna v. Target*, LASC Case No. BC353080; *Daglian v. Staples, Inc.*, LASC Case No. BC375325; *McCoy v. Kimko*, OCSC Case No. 07CC00007; *Ayvazi v. Ralphp Grocery Company*, LASC Case No. BC382980; *Razo v. C & D Zodiac, Inc.*, OCSC Case No 07-CC01373; *Sandoval v. Chevron Stations, Inc.* MCSC Case No. CV061690; and *Gomez v. Spenuzza, Inc. et al*, RCSC Case No RIC524075.

3. In the employment arena, I have participated in over 300 class and/or PAGA 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-class counsel in various cases where we prevailed in contested class certification motions. These cases include *Herrera v. Mountain Meadow Mushroom Farms, Inc.*, SDCSC Case No. 37-2009-00092416-CU-

1 MT-CTI; *Aguirre v. California Drop Forge, Inc.*, LASC Case No. BC374521; *Marroquin v.*
2 *Swissport North America, Inc.*, LASC Case No. BC390001; and *Romero v. Hydraulics*
3 *International, Inc.*, LASC Case No. 19STCV04463.

4 4. Throughout my thirty-three 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 50 class actions that have settled for over \$1 million each. Given my success and
7 experience, in my contingent fee practice I have averaged over \$850 per hour worked. Therefore, I
8 believe it appropriate to set my lodestar at no less than \$850 per hour in this case. This request is
9 fair in view of the much higher rate per hour that can be justified by the broadly accepted Laffey
10 Matrix which shows hourly rate of \$1,057 for attorneys out of law school for more than 20 years.

11 5. My involvement in this case has included legal research, investigation, extensive
12 preparation, development of a thorough knowledge of the legal issues related to certification and
13 liability, and communication with co-counsel and client throughout the litigation leading to the
14 ultimate resolution of this case. The settlement in this case was reached after three rounds of
15 mediation. Based upon the totality of circumstances, I believe that the result achieved in this case is
16 an extremely good outcome for all class members.

17 6. Based on my experience as class counsel in various consumer cases and given the
18 legal and factual realities presented in this case, I believe the proposed settlement is fair, reasonable
19 and adequate for the class members. As a result of my prior experience as class counsel in other
20 cases, I am fully aware of the responsibilities I would owe to the aggrieved employees in this action.

21 7. I was approached by Plaintiff Juan Navarro April of 2018 in connection with
22 potential claims he believed he had against his former landlord. After conducting an investigation
23 of the facts and analysis of the records, my co-counsel Joseph Lavi of Lavi & Ebrahimian and I
24 proceeded with the filing of a class action against Defendant.

25 8. Throughout the past sixty-eight months, I have been involved in the handling of this
26 case. My work on this case includes but is not limited to pre-litigation research, investigation
27 regarding the companywide practices of Defendant, communication with client and co-counsel, and
28 coordination of strategies during litigation as well as attendance at three mediations.

EXHIBIT "A"

Law Office of Sahag Majarian II

Navarro v. LA Southpark

Type	Payment Method	Date	Num	Source Name	Invoice	Invoice Date	Memo	Amount
Other Costs								
	Check	8/20/2018	1942	Case Anywhere	138684	8/7/2018	System Access Fee	\$111.60
	Check	12/16/2018	2056	Case Anywhere	145848	11/15/2018	System Access Fee	\$120.00
	Check	3/5/2019	2152	Case Anywhere	152620	2/7/2019	System Access Fee	\$120.00
	Check	5/18/2019	2232	Case Anywhere	159531	5/14/2019	System Access Fee	\$120.00
	Check	8/26/2019	2324	Case Anywhere	166514	8/7/2019	System Access Fee	\$120.00
	Check	11/22/2019	2419	Case Anywhere	173770	11/6/2019	System Access Fee	\$120.00
	Check	2/17/2020	2508	Case Anywhere	180982	2/7/2020	System Access Fee	\$120.00
	Check	5/23/2020	4091	Case Anywhere	188437	5/6/2020	System Access Fee	\$120.00
	Check	8/13/2020	4161	Case Anywhere	195786	8/6/2020	System Access Fee	\$120.00
	Check	11/15/2020	4260	Case Anywhere	203587	11/9/2020	System Access Fee	\$120.00
	Check	2/18/2021	4350	Case Anywhere	211552	2/4/2021	System Access Fee	\$120.00
	Check	5/17/2021	4446	Case Anywhere	219757	5/5/2021	System Access Fee	\$120.00
	Check	8/10/2021	4500	Case Anywhere	228233	8/2/2021	System Access Fee	\$120.00
	Check	11/24/2021	4586	Case Anywhere	236707	11/10/2021	System Access Fee	\$120.00
	Check	2/9/2022	4658	Case Anywhere	244909	2/3/2022	System Access Fee	\$120.00
	Check	5/16/2022	4753	Case Anywhere	253287	5/9/2022	System Access Fee	\$120.00
	Credit Card	9/9/2022		Case Anywhere	261746	8/6/22	System Access Fee	\$120.00
	Credit Card	11/10/2022		Case Anywhere	270439	11/9/2022	System Access Fee	\$120.00
	Credit Card	2/10/2023		Case Anywhere	278986	2/8/2023	System Access Fee	\$120.00
	Credit Card	5/10/2023		Case Anywhere	287829	5/9/2023	System Access Fee	\$120.00
	Credit Card	8/14/2023		Case Anywhere	296989	8/5/2023	System Access Fee	\$120.00
	Credit Card	11/6/2023		Case Anywhere	306759	11/4/2023	System Access Fee	\$120.00
TOTAL COSTS								\$2,631.60