

**BLUMENTHAL NORDREHAUG
BHOWMIK DE BLOUW LLP**

Norman B. Blumenthal (State Bar 068687)

Kyle R. Nordrehaug (State Bar #205975)

Aparajit Bhowmik (State Bar #248066)

2255 Calle Clara

La Jolla, CA 92037

Telephone: (858)551-1223

Facsimile: (858) 551-1232

Email: Kyle@bamlawca.com

Website: www.bamlawca.com

Nazo Koulloukian, SBN 263809

nazo@koullaw.com

KOUL LAW FIRM, APC

3435 Wilshire Blvd., Suite 1710

Los Angeles, CA 90010

Telephone: (213) 761-5484

Facsimile: (818) 561-3938

Sahag Majarian, II, Esq. SBN 146621

Sahagii@aol.com

LAW OFFICES OF SAHAG MAJARIAN II

18250 Ventura Blvd.

Tarzana, CA 91356

Telephone: (818) 609-0807

Facsimile: (818) 609-0892

Attorneys for Plaintiffs,

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ORANGE

MANUEL FRANCO and ALFONSO
GUZMAN, on behalf of themselves, on behalf
of all persons similarly situated, and on behalf
of the State of California as a private attorney
general,

Plaintiffs,

vs.

STATES LOGISTICS SERVICES, INC., a
California Corporation, and DOES 1 through
50, inclusive,

Defendants.

Case No.: **30-2022-01239095-CU-OE-CXC**

**DECLARATION OF
SAHAG MAJARIAN II IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing Date: November 8, 2024

Hearing Time: 1:30 p.m.

Judge: Hon. Lon Hurwitz

Dept.: CX103

Action Filed: July 6, 2021

Trial Date: Not set

DECLARATION OF SAHAG MAJARIAN II IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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 principle of Law Offices of Sahag Majarian II counsel to Plaintiff Alfonso Guzman 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 preliminary 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 and class actions, and have been appointed co-class counsel for the plaintiffs in no less than 300 wage and hour class 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. CV061690; *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. BC/ 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. Ralphs 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 class action arena, I have participated in over 300 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-class counsel

1 in various cases where we prevailed in contested class certification motions. These cases include
2 *Herrera v. Mountain Meadow Mushroom Farms, Inc.*, SDCSC Case No. 37-2009-00092416- CU-
3 MT-CTI; *Aguirre v. California Drop Forge, Inc.*, LASC Case No. BC374521; *Marroquin v.*
4 *Swissport North America, Inc.*, LASC Case No. BC390001; and *Romero v. Hydraulics*
5 *International, Inc.*, LASC Case No. 19STCV04463.

6 4. Throughout my thirty-four-year career in law, my practice has been exclusively
7 contingent fee work. Within the class action arena, I have been designated co-class counsel in no
8 less than 30 class actions that have settled for over \$1 million each.

9 5. My firm's involvement in this case has included legal research, investigation,
10 extensive preparation, development of a thorough knowledge of the legal issues related to
11 certification and liability, and full immersion and preparation for the mediation against
12 Defendants. The settlement in this case was reached after extensive negotiations during a full day
13 mediation with the Honorable Judge William Pate.

14 6. Based on my experience as Class counsel in other employment cases and given the
15 legal and factual realities presented in this case, I believe the proposed settlement is fair, reasonable
16 and adequate for the class and the aggrieved employees.

17 7. I do not have any conflict with any of the parties involved in this action and I am
18 ready to expand the financial resources and personal time leading to the ultimate conclusion of this
19 case.

20 I declare under the penalty of perjury under the laws of the State of California the foregoing
21 is true and correct and this declaration is executed October 15, 2024, in Tarzana, California.

22
23 *Sahag Majarian*

24 _____
25 SAHAG MAJARIAN II