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11 Attorneys for Plaintiff
YOUNES YOUNES
12

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

15 YOUNES YOUNES, on behalf of himself and
all others similarly situated,

16 Plaintiff,

17 v.
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19 ELVIRA TAYLOR and DOES 1 through 200
inclusive,

20 Defendants.
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Case No. 24STCV12520

**DECLARATION OF SHAUN P. MARTIN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR CLASS CERTIFICATION**

[Notice of Motion, Memorandum of Points and
Authorities, Statement Regarding Class
Notice, Proposed Notice of Pending Class
Action, Declarations of Younes Younes, Adam
Zarazinski, and Nicole G. Malick and
Proposed Order Filed Concurrently Herewith]

Assigned for All Purposes to Hon. Elihu Berle

Date: May 7, 2025
Time: 11:00 A.M.
Place: 312 N. Spring Street,
Los Angeles, CA 90012
Dept. 6

Action Filed: May 17, 2024
Trial Date: None

1 I, Shaun P. Martin, hereby declare and state as follows:

2 1. I am an attorney duly licensed to practice law in the State of California and admitted
3 to practice before this Court. I am counsel of record for Plaintiff Younes Younes. Based on my
4 personal knowledge, I assert the facts set forth herein and, if called upon as a witness, I could and
5 would competently testify thereto.

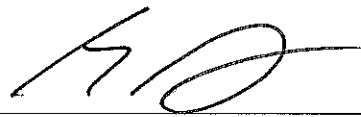
6 2. I have been a practicing attorney for over 30 years. I have extensive experience in
7 class action litigation, and have been appointed by the Court and served as class counsel in class
8 actions in both California state as well as federal court, including *Rierson v. Meritplan Ins. Co.*, No.
9 GIC804768 (Cal.) and *Urlaub v. CITGO Petroleum Corp.*, No. 21-C-4133 (N.D. Ill.).

10 3. If appointed Class Counsel, I will continue to zealously prosecute this action on
11 behalf of the named Plaintiffs and other class members and will dedicate the resources necessary to
12 bring the case to a successful resolution. I am not aware of any conflicts of interest that would impair
13 or impede my ability to represent them as I have done to date.

14 4. I have continuously and diligently prosecuted this action since its filing, successfully
15 obtained the temporary restraining order and preliminary injunction in this case, and possess the
16 resources and dedication to represent the Class on a fully contingent basis.

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

20 Executed on April 3, 2025, at San Diego, California.

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24 Shaun P. Martin