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10
11 Attorneys for Plaintiff Luis Lopez,
12 individually and on behalf of all similarly-situated and aggrieved employees

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **COUNTY OF LOS ANGELES**

15 LUIS LOPEZ, individually and on behalf of) Case No. 20STCV34691
16 all similarly-situated and aggrieved)
17 employees,)

18 Plaintiff,

19 vs.
20

21 GE UNITED TECHNOLOGIES, LLC, a)
22 Delaware Limited Liability Company d/b/a)
23 GRASSDOOR, and DOES 1 through 10,)
24 Inclusive,)

25 Defendants.
26
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) ASSIGNED FOR ALL PURPOSES TO:
) The Honorable William F. Highberger
) Dept. SS 10

) **CLASS AND REPRESENTATIVE ACTION**

) **DECLARATION OF RODNEY MESRIANI
) IN SUPPORT OF PLAINTIFF'S MOTION
) FOR APPOINTMENT OF CLASS COUNSEL**

) Date: May 16, 2022
) Time: 10:00 a.m.
) Dept: SS 10
) Judge: William F. Highberger

) Filed: September 11, 2020
) Trial date: None set
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1. I am an attorney duly licensed to practice law before all courts in the State of California. I am the Managing Attorney of Mesriani Law Group, A Professional Law Corporation and I represent Luis Lopez in this action. I have personal knowledge of the facts set forth herein and, if called and sworn in as a witness, could and would testify competently thereto.

3. I was admitted to the California State Bar in the fall of 1996. I am admitted to practice in all state courts in California, the Central District Court of California, and the Ninth Circuit.

5. I have been appointed as Class Counsel in the following proceedings: *Tasawar Abbas, et al. v. A-1 Security Screens, Inc.*, Los Angeles County Superior Court Case No. BC716439; *Michael Angelos, et al. v. City of Santa Monica*, Los Angeles County Superior Court Case No. BC627227; *Antonio Soto Jr., et al. v. H.T.L. Automotive, Inc., et al.* Los Angeles County Superior Court Case No. BC636374; *Laura Rubi, et al. v. Bergen Shippers Corp.*, Los Angeles County Superior Court Case No. BC715077; *Patricia Martinez v. Whaler LLC*, Los Angeles County Superior Court Case No. BC621047; *David Karayan, et al. v. Excel Studios, LLC*, Los Angeles County Superior Court Case No. BC666586; *Joseph Jun Caballero, et al. v. MLT, Inc.*,

1 Los Angeles County Superior Court Case No. BC659936; *Ashley Singer, et al. v. M.A.C.*
2 *Cosmetics, Inc.*, San Diego County Superior Court Case No. 37-2019-00033695-CU-OE-CTL;
3 *Brandon Centino, et al. v. Arrowhead Products Corporation.*, Orange County Superior Court Case
4 No. 30-2018-00988493; *Navid Bordbar, et al. v. Enterprise Rent-A-Car Co. of San Francisco,*
5 *LLC, et al.*, Orange County Superior Court Case No. 30-2017-00960085-CU-OE-CXC; *Kevin T.*
6 *Klein, et al. v. Loomis Armored US, LLC*, San Bernardino County Superior Court Case No.
7 CIVDS1704547, among others.

8 6. I continue to actively seek to develop my knowledge of California wage and hour
9 law and have taken many Continuing Legal Education classes related to wage and hour law and
10 class action law. I have been an active member of the Consumer Attorneys Association of Los
11 Angeles and the American Association for Justice, formerly the Association of Trial Lawyers of
12 America, and regularly consult with their members regarding cutting edge developments in
13 California wage and hour law.

14 7. I consider myself experienced and qualified to evaluate the Class claims and
15 viability of the defenses. Based on the history of the above-captioned case, and given my
16 experience and analysis, it is my view that the settlement is fair, reasonable, and adequate, and in
17 the best interest of the class members. Had the litigation not reached the proposed settlement set
18 forth in the Settlement Agreement, I, along with my co-counsel, would have continued to
19 prosecute the class' claims through certification, trial and beyond.

20 8. In this litigation, the Parties attended mediation with Todd A. Smith, a well-
21 regarded and experienced wage and hour class action mediator. Based on the history of this case,
22 and given our firm's extensive experience as class action employment and wage and hour
23 litigators, and having fully participated in the mediation facilitated by mediator Todd A. Smith, it
24 is our view that the proposed Settlement is fair, reasonable, and adequate and in the best interest of
25 the members of the Class. This experience has allowed co-counsel and my firm to fully endorse
26 the terms and conditions of the proposed settlement.

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1 9. I declare under the penalty of perjury under the laws of the State of California that
2 the foregoing is true and correct and that this declaration is executed on
3 3/16/22, in Los Angeles, California.

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5 Rodney Mesriani