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MESRIANI LAW GROUP, APLC

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Attorneys for Plaintiffs CHRISTOPHER ORNELAS, on behalf of himself and all others similarly situated, and CHRISTOPHER NIETO, on behalf of himself and all others aggrieved

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

CHRISTOPHER ORNELAS, on behalf of
himself and all others similarly situated and
CHRISTOPHER NIETO, on behalf of
himself and all others aggrieved,

Plaintiffs,

vs.

TEKSYSTEMS, INC., a Maryland
Corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No. 19STCV39944

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Carolyn B. Kuhl
Department 12

CLASS AND REPRESENTATIVE ACTION

**DECLARATION OF RODNEY MESRIANI IN
SUPPORT OF PLAINTIFFS' MOTION FOR
ORDER GRANTING FINAL APPROVAL OF
CLASS AND PAGA ACTION SETTLEMENT**

Hearing Set By March 27, 2024 Order

Date: August 29, 2024

Time: 10:30 a.m.

Dept: SS12

Judge: Carolyn B. Kuhl

Complaint filed: November 6, 2019

Trial date: Not set

1 I, Rodney Mesriani, declare as follows:

2 1. I am an attorney duly licensed to practice law before all courts in the State of
3 California. I am the Managing Attorney of Mesriani Law Group, A Professional Law
4 Corporation, co-counsel for Plaintiffs Christopher Ornelas and Christopher Nieto in this action.
5 (“Plaintiffs”). I have personal knowledge of the facts set forth herein and, if called and sworn in
6 as a witness, could and would testify competently thereto.

7 2. I received a Bachelor of Science degree in Accounting from California State
8 University at Northridge in 1993. I received a law degree from Southwestern School of Law in
9 1996. In law school, I was a law clerk for Judge William J. Rea of the United States District
10 Court, Central Branch and also for the Department of Corporations.

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

14 4. I started Mesriani Law Group in 1997. My firm represents plaintiffs in individual
15 employment disputes as well as complex and class action litigation, including wage and hour,
16 labor and employment, consumer protection, and other public interest class actions. I have
17 handled thousands of labor and employment cases over the last two decades. For years, I have
18 been rated AV Preeminent by Martindale-Hubbell and have been a member of the prestigious
19 Multi-Million Dollar Advocates Forum. I have been appointed Class Counsel in over a dozen
20 wage and hour class actions.

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

1 *et al. v. MLT, Inc.*, Los Angeles County Superior Court Case No. BC659936; *Ashley Singer, et*
2 *al. v. M.A.C. Cosmetics, Inc.*, San Diego County Superior Court Case No. 37-2019-00033695-
3 CU-OE-CTL; *Brandon Centino, et al. v. Arrowhead Products Corporation.*, Orange County
4 Superior Court Case No. 30-2018-00988493; *Navid Bordbar, et al. v. Enterprise Rent-A-Car*
5 *Co. of San Francisco, LLC, et al.*, Orange County Superior Court Case No. 30-2017-00960085-
6 CU-OE-CXC; *Kevin T. Klein, et al. v. Loomis Armored US, LLC*, San Bernardino County
7 Superior Court Case No. CIVDS1704547; *Luis Lopez, et al. v. GE United Technologies, LLC*
8 *d/b/a Grassdoor*, Los Angeles County Superior Court; *Myers v. Blue Shield of California Life &*
9 *Health Insurance Company*, Los Angeles County Superior Court Case No. 19STCV09341.

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

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

24 8. I have devoted 51.0 hours to this action. My hourly rate is \$795.00 per hour.
25 Based on my own research and experience, this hourly rate is below the average/mean range of
26 the typical rates of a Los Angeles area law firm that practices complex litigation and is
27 consistent with, if not lower than, the prevailing rates for attorneys of similar experience, skill
28 and reputation. Attached as Exhibit A is a true and correct copy of my Time Records.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration is executed on August 6, 2024, in Los Angeles, California

Rodney Mesriani

EXHIBIT A

MESRIANI LAW GROUP

a professional law corporation

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rodney@mesriani.com

Rodney Mesriani, Esq.
Attorney for Ornelas, et al.

Billing Invoice:
Ornelas, et al. v. Teksystems

DESCRIPTION	HOURS	RATE	AMOUNT
Client Consultation & Fact Gathering	2.50	\$795.00	\$1,987.50
File Review, Research, & Legal Analysis	4.50	\$795.00	\$3,577.50
Multiple Conferences with Co-Counsel re: Strategy	2.00	\$795.00	\$1,590.00
Review various Pleadings, Motions, Discovery, Correspondence, & Provide Input- Strategize with Counsel	26.00	\$795.00	\$20,670.00
Mediation Brief Review, File, Export Analysis, Preparation for Mediation & Attend Mediation	16.00	\$795.00	\$12,720.00
TOTAL:	51.00		\$40,545.00

EXHIBIT B

MESRIANI LAW GROUP

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Case No. 19STCV39944

Payee	Details	Amount
Case Anywhere	(Inv. 228341)	\$120.00
Case Anywhere	(Inv. 188494)	\$111.60
	Total	\$231.60