

1 Harout Messrelian (SBN 272020)

2 hm@messrelianlaw.com

3 **MESSRELIAN LAW INC.**

4 500 N. Central Ave., Suite 840

5 Glendale, California 91203

6 Telephone: (818) 484-6531

7 Facsimile: (818) 956-1983

8 Attorneys for Plaintiff Anthony Doss

9 *[Additional counsel on following page]*

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF LOS ANGELES**

12 THOMAS BROWN and ANTHONY DOSS,
13 individually, on behalf of all others similarly
14 situated, and on behalf of the State of California
15 and other aggrieved persons,

16 *Plaintiffs,*

17 v.

18 FIDELITY SECURITY SERVICES, INC., a
19 corporation; and DOES 1 through 10, inclusive,

20 *Defendants.*

Case No.: 21STCV31617

CLASS & REPRESENTATIVE ACTION

*[Assigned for all purposes to: Hon. Stuart M.
Rice, Dept. 1]*

**DECLARATION OF HAROUT
MESSRELIAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

FINAL APPROVAL HEARING

Date: January 21, 2025

Time: 10:30 a.m.

Dept.: 1

Complaint filed: August 26, 2021

FAC filed: May 29, 2024

Trial date: Not set

1 Arrash T. Fattahi (SBN 333676)
2 arrash.fattahi@wilshirelawfirm.com

3 **WILSHIRE LAW FIRM, PLC**

4 3055 Wilshire Blvd., 12th Floor

5 Los Angeles, California 90010

6 Telephone: (213) 381-9988

7 Facsimile: (213) 381-9989

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9 Attorneys for Plaintiff Thomas Brown
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1. I am an attorney duly licensed to practice before all the Court of the State of California. I am the managing attorney of Messrelian Law Inc. and the attorney of record for Plaintiff Anthony Doss.

3. Except as otherwise indicated, I have personal knowledge of all matters set forth herein and, if called as a witness, could and would competently testify thereto under oath.

5. On or around March 4, 2021, my office filed a 13 cause of action individual wage

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1 and hour and PAGA lawsuit against Defendants Fidelity Security Services, Inc. and Ahmadi
2 Ahmadshah, Los Angeles County Superior Court, Case No. 21STCV08643. On or around
3 November 2022, I spoke to attorneys from the Wilshire Law Firm, PLC about prosecuting the case
4 together since Wilshire Law Firm, PLC had filed a class action complaint on or around August 26,
5 2021 in the *Thomas Brown v. Fidelity Security Services, Inc.* matter. A Joint Prosecution
6 Agreement between the firms and the Plaintiffs was formalized and signed in or around March
7 2023.

8 6. I directly participated in all of the material aspects of this litigation. The work that
9 I performed on this matter over the past three-plus years included, but was not limited to, the
10 following: initial client intake and research of Defendant company; performing pre-LWDA notice
11 investigation; drafting the LWDA notice; drafting the initial PAGA complaint on this matter on
12 behalf of Plaintiff Doss; numerous court appearances; propounding formal discovery; propounding
13 informal discovery; reviewing and analyzing the document production, including employee
14 records; sending data to expert data analyst and reviewing data analysis results; mediation
15 preparation, attendance at the full-day mediation; reviewing the Memorandum of Understanding;
16 reviewing the long-form settlement agreement; phone and email communications with defense
17 counsel and fellow Plaintiff Brown's counsel; and phone and email communications with Plaintiff
18 Doss. This does not include additional time that will be devoted to this case, such as any court
19 appearances for settlement approval.

20 7. Myself and Plaintiff Brown's attorneys in this case are experienced in prosecuting
21 class and PAGA lawsuits. Counsel for the Defendant Fidelity Security Services, Inc. ("Defendant,"
22 and together with Plaintiffs, the "Parties") are experienced in defending class and PAGA cases.
23 Based on my own independent investigation and evaluation, I am of the opinion that the Settlement
24 for the consideration and on the terms set forth in the Agreement are fair, reasonable and adequate
25 and are in the best interests of Plaintiffs, the putative class members, the aggrieved employees, the
26 State, and Defendant in light of all known facts and circumstances and the risks inherent in
27 litigation, especially in considering Defendant's proven financial condition.

28 8. Plaintiffs further recognize that the issues presented in the class and representative

PAGA claim are likely only to be resolved with extensive and costly pretrial and trial proceedings, and that further litigation will cause inconvenience, distraction, disruption, delay, and expense disproportionate to the maximum potential benefits to the class members, aggrieved employees, and Plaintiffs from continued litigation, resulting in less monetary compensation to Plaintiffs, Plaintiffs' attorneys, putative class members, the aggrieved employees, and the State of California.

9. My firm has a fee sharing agreement with Wilshire Law Firm, PLC that was memorialized as a Joint Prosecution Agreement. Under the Agreement, Wilshire Law Firm, PLC will receive 75% of the fees collected in this matter and Messrelian Law Inc. will receive 25% of the fees collected in this matter. Both Plaintiffs have consented to this fee split in a separate joint prosecution agreement between the law firms and have signed the agreement. Upon request from the Court, Plaintiffs' counsel can provide a copy of the Joint Prosecution Agreement.

10. The total current lodestar for Messrelian Law Inc. is not less than the following:

Person	Role	Hours	Rate	Lodestar
Harout Messrelian	Managing Attorney	38.5	\$550	\$21,175
Total:				\$21,175

11. Messrelian Law Inc. has spent over 38 hours, for a lodestar of \$21,175 litigating and resolving this action.

12. As of the drafting of the Motion for Final Approval, my office has incurred around \$5,961.70 in expenses for this action. Attached as **Exhibit 1** is a list of the costs and the categories of costs for the costs incurred in this case to date by Messrelian Law Inc.

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

Executed on December 26, 2024, at Glendale, California.

/s/ Harout Messrelian

Harout Messrelian

Exhibit 1

MESSRELIAN LAW INC.

Transaction Detail by Account

All Transactions

12/26/2024

Accrual Basis

<u>Type</u>	<u>Memo</u>	<u>Amount</u>	<u>Balance</u>
Mediation Fees			
		\$4,295.00	\$4,295.00
Total MEDIATION FEES		\$4,295.00	\$4,295.00
Expert Fees			
	Expert Fees	\$850.00	\$850.00
Total EXPERT FEES		\$850.00	\$850.00
Legal Expenses			
	Department of Industrial Relations	\$75.00	\$75.00
	Lawsuit Filing Fee	\$454.22	\$529.22
	Filing of Stipulation	\$27.81	\$557.03
	Jury Fees	\$161.39	\$718.42
	Filing of 170.6 in person	\$68.00	\$786.42
	Misc. filing fees	\$30.28	\$816.70
Total LEGAL EXPENSES		\$816.70	\$816.70
TOTAL			<u>\$5,961.70</u>

PROOF OF SERVICE

Brown, et al. v. Fidelity Security Services, Inc., et al.
21STCV31617

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, Ashley Narinyans, am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to this action. My business address is 3055 Wilshire Blvd., 12th Fl., Los Angeles, California 90010. My electronic service address is ashley.narinyans@wilshirelawfirm.com.

On December 26, 2024, I served the foregoing **DECLARATION OF HAROUT MESSRELIAN IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**, on the interested parties by placing a true copy thereof, enclosed in a sealed envelope by following one of the methods of service as follows:

Howard M. Knee (SBN 55048)
howard.knee@blankrome.com
Taylor C. Morosco (SBN 316401)
taylor.morosco@blankrome.com
BLANK ROME LLP
2029 Century Park East, 6th Floor
Los Angeles, California 90067
Telephone: (424) 239-3400
Facsimile: (424) 389-7048

Attorneys for Defendant

(X) **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed above via third-party cloud service **CASEANYWHERE**.

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hm@messrelianlaw.com
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500 N. Central Ave., Suite 840
Glendale, California 91203
Telephone: (818) 484-6531
Facsimile: (818) 956-1983

Attorneys for Plaintiff Anthony Doss

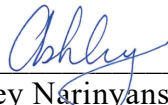
(X) **BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known e-mail address or e-mail of record in this action.

(X) **BY UPLOAD:** I hereby certify that the documents were uploaded by my office to the State of California Labor and Workforce Development Agency Online Filing Site.

///

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

2 Executed this **December 26, 2024**, at Los Angeles, California.

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Ashley Narinyans