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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF LOS ANGELES**
12

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

17 *Plaintiffs,*

18 v.

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

21 *Defendants.*
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Case No.: 21STCV31617

CLASS & REPRESENTATIVE ACTION

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

**DECLARATION OF PLAINTIFF
ANTHONY DOSS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

DECLARATION OF PLAINTIFF ANTHONY DOSS

I, Anthony Doss, declare as follows:

1. I am a resident of the State of California and am over 18 years of age. I am a named Plaintiff in this action and am represented by Harout Messrelian of Messrelian Law Inc. Except as otherwise stated, I have personal knowledge of all matters set forth in this declaration and could and would competently testify thereto if called upon to do so as a witness.

2. I first started working for Fidelity Security Services, Inc. ("Defendant") in or around March 2020 as a security guard. My employment with Defendant ended in or around May 2020.

3. I understand that the initial lawsuit I filed in the Los Angeles County Superior Court (Case No. 21STCV08643) includes a Private Attorneys General Act cause of action, otherwise known as a PAGA lawsuit or PAGA claim. I also understand that I am joining in as a class action representative in the present case of *Thomas Brown v. Fidelity Security Services, Inc.* I understand that my name is on the cover of the lawsuit. I understand that I am the representative of other employees of Defendant. As a representative in this lawsuit, I have duties to the State of California and other employees like me who were not paid correctly for all hours worked, not provided all required meal and rest periods, and not reimbursed for necessary business expenses. I have fairly represented the other employees and the State throughout this lawsuit. I don't have any disagreements with the other employees I represent. I am not aware of any reason why I can't make the best decisions for them in this lawsuit.

4. When I agreed to hire my attorneys to file a lawsuit, I also agreed that I would be the representative of the other employees and the State of California. I agreed that the interests of the other employees and the State in the lawsuit are as important as my personal interests in suing Defendant. I agreed that I would do what is in the best interests of the other employees and the State when deciding whether or not to settle the lawsuit. I also agreed to actively participate in the lawsuit. I also understand that there will only be a settlement of the lawsuit if the Court allows it. I understood that being a plaintiff/class representative in this case meant that I was seeking damages not only for myself but also other individuals who worked for the Defendant in California. I felt that these individuals were not aware of their labor law rights and even if they were, they

1 would probably be apprehensive about speaking up or even simply because of the time, effort and
2 risk involved in filing a class action lawsuit.

3 5. Although I did not keep time records, I spent time and effort on this case. The work
4 I have done on this case includes hiring my attorneys, speaking with my attorneys by phone,
5 explaining what my employment at Defendant was like, explaining what my employment at
6 Defendant had in common with other employees who worked for Defendant, explaining my claims
7 to my attorneys, and communicating with my attorneys about the settlement agreement and related
8 documents.

9 6. I believe I did the right thing by filing this case on behalf of other employees who,
10 subject to court approval, are in line to receive monetary payments as a result of this case and
11 settlement. This is money they may never have ever gotten if I did not pursue this action on their
12 behalf. I feel significant personal satisfaction to know that I played a role in the other employees
13 being entitled to monetary payments as a result of the filing of this lawsuit. In light of the time I
14 have spent on this case, the risk I undertook by suing a former employer, the exposure to being
15 responsible for paying Defendant's costs in the event we did not win the case, the reputational risk
16 that future employers may hold this lawsuit against me, and in light of the size of the settlement, I
17 believe the request for \$5,000.00 as an enhancement is fair and reasonable.

18 7. I reviewed (and ultimately signed) the Class Action and PAGA Settlement
19 Agreement in full and my attorneys answered all the questions I had. I believe the settlement terms
20 and allocations are fair, adequate, and reasonable given the strength of the class claims and
21 Defendant's defenses. I also negotiated an individual settlement of my individual wage and hour
22 claims, which were brought alongside my PAGA claims. As part of my individual settlement, I
23 will be signing a general release of all claims, whether known or unknown, that I may have against
24 Defendant. I do not believe that my individual settlement has any bearing on whether I have served
25 the other employees' best interests and will continue to do so.

26 8. I have no conflicts of interest, actual or potential, with any class member, the
27 Settlement Administrator (Apex Class Action, LLC), or the proposed Cy Pres (Legal Aid at Work).
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9. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

10. I am aware of the fee splitting agreement between Wilshire Law Firm and Messrelian Law Inc. where Wilshire Law Firm will receive 75% of the fees collected in this matter and Messrelian Law Inc., will receive 25% of the fees collected in this matter. I have consented to this fee split in a separate joint prosecution agreement between the law firms that I have signed.

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 06/27/24, at Los Angeles, California.

Anthony Doss
Anthony Doss (Jun 27, 2024 11:32 PDT)

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

PROOF OF SERVICE

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

3 Executed this **June 28, 2024**, at Los Angeles, California.

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