

MESSRELIAN LAW INC.

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Attorneys for Plaintiff,

ALFREDO BETANCOURT, and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN MATEO

(UNLIMITED JURISDICTION)

ALFREDO BETANCOURT, on behalf of
himself, all others similarly situated, and
the general public, and as an “aggrieved
employee” on behalf of other “aggrieved
employees” under the Labor Code Private
Attorneys General Act of 2004,

Plaintiff(s),

vs.

L3 TECHNOLOGIES, INC.; and DOES 1
to 25, inclusive,

Defendant(s).

Case No.: 23-CIV-05704

**DECLARATION OF MARALLE
MESSRELIAN IN SUPPORT OF
PLAINTIFF’S UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF
STIPULATION AND SETTLEMENT OF
CLASS ACTION AND PAGA CLAIMS**

Action filed: December 1, 2023

Hearing Date: November 22, 2024

Hearing Time: 2:00 p.m.

Hearing Dept: 24, Hon. Jeffrey R.
Finigan

1 **DECLARATION OF MARALLE MESSRELIAN IN SUPPORT OF PLAINTIFF’S**
2 **UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF STIPULATION AND**
3 **SETTLEMENT OF CLASS ACTION AND PAGA CLAIMS**

4 I, MARALLE MESSRELIAN, declare as follows:

5 1. I am an attorney duly licensed to practice law in the State of California and am
6 an attorney of record for Plaintiff Alfredo Betancourt (“Plaintiff”) in his lawsuit against
7 Defendant L3 Technologies, Inc. (“Defendant”). Plaintiff and Defendant are collectively
8 referred to as the “Parties”.

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

11 ***Background of Class Counsel***

12 3. In 2003, I earned a Bachelor of the Science degree with a major in Accounting
13 from Cal State University, Northridge. In 2017, I earned a Juris Doctor degree from
14 Southwestern University School of Law.

15 4. In December of 2017, the Supreme Court for the State of California admitted
16 me as an Attorney and Counselor at Law and licensed me to practice law in all the Courts of
17 this State.

18 5. I am experienced in handling employment law matters and specifically wage
19 and hour cases. I have been practicing law since 2017. My experience has been almost
20 exclusively in the area of employment law representing employees with claims of wrongful
21 termination, harassment, whistleblower retaliation, discrimination, wage and hour, and family
22 and medical leave violations. I am a member of the California Employment Lawyers
23 Association (CELA).

24 6. In my representation of employees, I have prosecuted several lawsuits on
25 behalf of employees with claims of rest and meal period and overtime violations or other wage
26 claims.

27 7. I have been involved in the prosecution of numerous wage and hour class and
28 representative actions at various stages of litigation. A small sampling of the wage and hour
class and representative action cases in which I have been counsel of record is as follows:

1 a) *Joshua Silva v. Payo Laboratories, Inc., et al.*, San Luis Obispo County
2 Superior Court, Case No. 19CV-0689 (appointed Class Counsel and granted final approval of
3 class action settlement by the court).

4 b) *Mervin Perkins v. CC Venice, LLC, et al.*, Los Angeles Superior Court,
5 Case No. BC703660 (appointed Class Counsel and granted final approval of class action
6 settlement by the court).

7 c) *Jashar Bryant v. Pinnacle Cabling & Construction, Inc., et al.*, Orange
8 County Superior Court, Case No. 30-2020-01123094-CU-OE-CXC (appointed Class Counsel
9 and granted final approval of class action settlement by the court).

10 d) *Collins v. Spa Products Import & Distribution Co., LLC, et al.*, Los Angeles
11 County Superior Court, Case No. 19STCV10586 (granted final approval of class action
12 settlement by the court)

13 e) *Sabrina Slater v. Avalon Care Center – Sonora, L.L.C., et al.*, Tuolumne
14 County Superior Court, Case No. CV62006 (granted final approval of class action settlement
15 by the court)

16 f) *Violet Avalos v. Smithcare Incorporated, et al.*, Tulare County Superior
17 Court, Case No. VCU272975 (granted final approval of class action settlement by the court)

18 g) *David Contreras v. HTX Services LLC, et al.*, Los Angeles County Superior
19 Court, Case No. 19STCV43405 (granted final approval of class action settlement by the court)

20 h) *Devin Cherry v. LA Corral Three, Inc., et al.*, Kern County Superior Court,
21 Case No., BCV-18-101817-DRL (granted final approval of class action settlement by the
22 court)

23 i) *Vikki Curl and Anthony J. Gratton v. Reel Security Corp., et al.*, Los
24 Angeles County Superior Court, Case No. 18STCV09302 (granted final approval of class
25 action settlement by the court)

26 j) *Corrine Lashbrook and Joshua Sweat v. Andy's BP, Inc., et al.*, San Mateo
27 County Superior Court, Case No. 19CIV02344 (granted final approval of class action
28 settlement by the court)

1 k) *Stephen Aguirre and Christopher Walls v. Anlin Industries*, Fresno County
2 Superior Court, Case No. 17CECG04326 (order and judgment approving PAGA settlement by
3 the court)

4 l) *Rebecca Mallory v. Odyssey Healthcare Operating A, L.P.*, Kern County
5 Superior Court, Case No. BCV-19-102735 (order and judgment approving PAGA settlement
6 by the court)

7 m) *Wendy Chavez v. Texas De Brazil (Fresno) Corporation, et al.*, Fresno
8 County Superior Court, Case No. 19CECG04249 (order and judgment approving PAGA
9 settlement by the court)

10 n) *Kevin Littleton v. Lincoln Military Property Management LP.*, San Diego
11 County Superior Court, Case No. 37-2018-00061799-CU-OE-NC (order and judgment
12 approving PAGA settlement by the court)

13 o) *Krystal Thomas v. Choice Physicians Network, Inc., et al.*, San Bernardino
14 County Superior Court, Case No. CIVDS2013964 (order and judgment approving PAGA
15 settlement by the court)

16 p) *Otina Sengvong v. Probuild Company, LLC, et al.*, United States District
17 Court, Southern District of California, Case No. 3:19-cv-02231-MMA (JLB) (granted final
18 approval of class action settlement by the court)

19 q) *Orland Perez Avalos v. Milagros Restaurant LLC, et al.*, San Mateo County
20 Superior Court, Case No. 22-CIV-01222 (order and judgment approving PAGA settlement by
21 the court)

22 r) *David Xiqui Vasquez v. The Province LLC, et al.*, Santa Clara County
23 Superior Court, Case No. 22CV397541 (order and judgment approving PAGA settlement by
24 the court)

25 s) *Manuel Melendrez v. Clean Auto Inc., et al.*, San Mateo County Superior
26 Court, Case No. 22CIV01967 (order and judgment approving PAGA settlement by the court)

27 t) *Arturo Vera Lopez v. Green Valley Landscape, et al.*, Monterey County
28 Superior Court, Case No, 22CV003751 (order and judgment approving PAGA settlement by

1 the court)

2 u) *Erasmus Gomez v. A-I Jay's Machining, Inc., et al.*, Santa Clara County
3 Superior Court, Case No. 22CV394795 (order and judgment approving PAGA settlement by
4 the court)

5 v) *Iris Rodriguez v. Facility Masters, Inc.*, Santa Clara County Superior Court,
6 Case No. 23CV423999 (order and judgment approving PAGA settlement by the court)

7 w) *Mariana Ruelas v. Vista La Mesa Senior Living, Inc., et al.*, San Diego
8 Superior Court, Case No. 37-2023-00050755-CU-OE-CTL (order and judgment approving
9 PAGA settlement by the court).

10 x) *Jose Angel Lopez v. Moreno & Associates, Inc., et al.*, Santa Clara Superior
11 Court, Case No. 23CV422622 (order and judgment approving PAGA settlement by the court).

12 8. I believe that the Settlement is fair, adequate, and reasonable. The Settlement
13 provides substantial monetary benefits to Class Members and is a product of diligent efforts of
14 Class Counsel to obtain the best possible result for the Class Members. This Settlement was
15 reached following thorough legal and factual research and analysis, thorough review of
16 extensive data relative to the claims in the action, arduous settlement negotiations, and
17 thorough investigation of the underlying facts by the respective parties and review of records.
18 The settlement negotiations were, at all times, adversarial and non-collusive in nature. The
19 proposed Settlement is within the range of reasonableness, and Class Members have supported
20 the Settlement.

21 I declare under the penalty of perjury of the laws of the State of California that the
22 foregoing is true and correct to the best of my knowledge.

23 Executed on Saturday, October 26, 2024 at Glendale, California.

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25 
26 MARALLE MESSRELIAN,
27 Declarant
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