

MESSRELIAN LAW INC.

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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MONTEREY

AURORA GARCIA JIMENEZ, EDWARD
ANGUIANO II, and EVELYN SERRATO
on behalf of themselves and on behalf of all
persons similarly situated,

Plaintiffs,

vs.

KIND OP CORP.; ULTRA PERSONNEL,
LLC; and DOES 1 through 25, inclusive,

Defendant(s).

Case No. 22CV001723

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

Hearing Date: September 6, 2024
Hearing Time: 8:30 a.m.
[Hearing set by Order dated February 15, 2024]

Judge: Hon. Carrie M. Panetta
Dept: 14

Action Filed: June 17, 2022
Trial Date: Not set

DECLARATION OF HAROUT MESSRELIAN

I, HAROUT MESSRELIAN, declare and state as follows:

1. I am an attorney duly licensed to practice before all the Courts of the State of California. I am the managing attorney of Messrelian Law Inc. and the attorney of record for Plaintiff Aurora Garcia Jimenez (individually, “Jimenez” or “Plaintiff”).

2. 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.

3. I am experienced in handling employment law matters and specifically wage and hour representative and individual actions. My qualifications are as follows: I received my JD from Loyola Law School in 2010. I started my own law firm in 2011 – the Law Offices of Harout Messrelian. Since 2016, I have been the founder and principal attorney at Messrelian Law, Inc. Since 2011, I have filed and handled over 275 civil actions and/or claims involving representative actions under the Private Attorneys General Act (“PAGA”) and/or wage and hour claims on behalf of my clients and have been appointed Class Counsel in three class action cases –*Zohrab Mekhitarian v. Triple Play Motors dba Bob Smith Toyota*, Los Angeles Superior Court Case No. 19STCV22411 (ADR Services, Inc., Case Number 20-2668-RWT), *Carina Camberos, on behalf of herself and others similarly situated, v. Great American Chicken Corp, Inc.*, Los Angeles Superior Court Case No. 21STCV32015, and *Robert Garcia, on behalf of himself and others similarly situated v. HD Supply Management Inc.*, San Bernardino Superior Court Case No. CIVSB2028067. I have a practice that encompasses cases in the Los Angeles Superior Courts, the Orange County Superior Courts, the Riverside County Superior Courts, the San Bernardino County Superior Courts, the Alameda County Superior Courts, Santa Clara County Superior Courts, San Mateo County Superior Courts, and the Monterey County Superior Courts.

4. I represent Plaintiff on a straight contingency basis. To date, I have investigated and prosecuted this matter for approximately 30.5 hours, including reviewing the initial intake and Plaintiff’s records, drafting the initial PAGA notice, reviewing Defendants’ informal document production, including wage and hour policies, sending and receiving emails on the case with defense counsel and co-counsel, including substantive discussions and settlement communications, reviewing the data expert’s findings/conclusions, preparing for and attending

two mediations. I also expect to perform additional work on this case if the Court grants final approval of the Settlement, including supervision of the Settlement Administrator's disbursement of the settlement funds to the Aggrieved Employees.

5. In this case, my firm has a total lodestar of approximately \$33,950.00 without the use of any multiplier. A general summary showing of the pre-multiplier lodestar and the total number of hours of work performed by my firm is set forth below with a total lodestar of approximately \$33,950.00.

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Pre-Multiplier Lodestar</u>
Harout Messrelian (14 th Year Attorney)	30.50	\$700.00	\$21,350.00
Maralle Messrelian (7 th Year Attorney)	25.2	\$500.00	\$12,600.00
Totals	55.7		\$33,950.00

I will make detailed copies of such records available to the Court for in camera inspection upon its request. Moreover, I will have waited for over two and a half years to be awarded attorneys' fees for work performed since March of 2022, when Plaintiff first contacted my office, compared to Defendants' counsel who have been paid as they performed work during this case.

6. In addition, my firm incurred substantial costs, \$13,369.31 to date, which consist of mediator fees, data analysis fees, filing fees and attorney service fees. A true and correct summary of my firm's costs and expenses incurred to date is attached as **Exhibit 1** to this declaration. I will make detailed copies of such records available to the Court for *in camera* inspection upon its request. As the evidence submitted herewith shows, all of these costs are documented and reasonably incurred. Accordingly, they warrant the Court's approval.

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

Executed on August 13, 2024, at Glendale, California.



HAROUT MESSRELIAN,
Declarant

EXHIBIT 1

Aurora Garcia Jimenez

(Superior Court of California, Monterey, Case No. 22CV001723)

Messrelian Law Inc. Costs and Expenses	Total
LWDA Notice Filing Fee	\$ 75.00
Complaint Filing	\$ 1,489.31
Atty Service Fees	\$ 155.00
Mediator Fees - Steve Mehta (11/1/2022)	\$ 8,750.00
Mediator Fees -Lou Marlin (4/17/2023)	\$ 2,000.00
Data Analyst for Mediation	\$ 900.00
Current and Estimated Costs through 08/12/2024	\$ 13,369.31