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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **FOR THE COUNTY OF SANTA CLARA**

13 **(UNLIMITED JURISDICTION)**

14 JOSE ANGEL LOPEZ,

15 *Plaintiff,*

16 vs.

17 MORENO & ASSOCIATES, INC.;

18 J ERNESTO MORENO; and

19 DOES 1 to 25, inclusive,

20 *Defendants.*

Case No.: 23CV422622

**DECLARATION OF MARALLE
MESSRELIAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

Action filed: September 11, 2023

Hearing Date: July 17, 2024

Hearing Time: 1:30 p.m.

Hearing Dept: 19, Hon. Theodore C.
Zayner

DECLARATION OF MARALLE MESSRELIAN IN SUPPORT OF
PAGA SETTLEMENT AND RELEASE

1. I am an attorney duly licensed to practice law in the State of California and am an attorney of record for Plaintiff Jose Angel Lopez (individually, “Lopez” or “Plaintiff”) in his lawsuit against Defendants Moreno & Associates, Inc. and J Ernesto Moreno (“Defendants” or “Moreno”).

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.

Background

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

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

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

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

7. I have been involved in the prosecution of numerous wage and hour class and 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:

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

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

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

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

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

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

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

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

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

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

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

28 l) *Rebecca Mallory v. Odyssey Healthcare Operating A, L.P.*, Kern County

1 Superior Court, Case No. BCV-19-102735 (order and judgment approving PAGA settlement by
2 the court)

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

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

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

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

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

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

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

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

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

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

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

6 8. The hourly rate for my time is \$500.00 per hour which is my usual and customary
7 hourly rate charged for my services in similar PAGA and complex class actions.

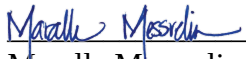
8 9. The total number of hours spent by me on this litigation is 50.7 hours through
9 June 24, 2024.

10 10. My total lodestar amount through June 24, 2024 is \$23,780.00.

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

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

22 Executed on June 24, 2024 at Glendale, California.

23 
24 Maralle Messrelian,
25 Declarant
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