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5 Attorney for Plaintiff,
JESSICA GASCON
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7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **FOR THE COUNTY OF RIVERSIDE**
9 **(UNLIMITED JURISDICTION)**

10 JESSICA GASCON,
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12 Plaintiff,

13 vs.

14 OMEGA EXTRUDING CORP. OF
15 CALIFORNIA; and DOES 1 to 25, inclusive,

16 Defendants.
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Case No.: CVRI2305243

*[Assigned for all purposes to Honorable
Harold Hopp, Judge]*

**DECLARATION OF JESSICA GASCON
IN SUPPORT OF UNOPPOSED PAGA
APPROVAL MOTION**

[Filed Concurrently with Notice of Motion,
Memorandum of Points and Authorities,
Declaration of Harout Messrelian, Declaration
of Michael Sutherland, and Proposed Order]

Hearing Date: September 16, 2026

Time: 8:30 a.m.

Department: 1

Complaint Filed: October 3, 2023

DECLARATION OF JESSICA GASCON

I, Jessica Gascon, declare as follows:

1. I am a resident of the State of California and am over 18 years of age. I am the named Plaintiff in this action and am represented by Harout Messrelian of Messrelian Law, Inc. in this action. 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 Defendant on or around October 2019 and my employment with Defendant ended on or around May 2023.

3. I understand that this lawsuit is a Private Attorney General action, otherwise known as a PAGA lawsuit. I understand that I am the Plaintiff and that Omega Extruding Corp. of California ("OMEGA" or "Defendant") is the Defendant. I understand that my name is on the cover of the lawsuit. I understand that I am the representative of other OMEGA employees. As the representative in this lawsuit, I have duties to the State of California and other employees like me who were not provided all required meal and rest periods. I also understand that my lawsuit is on behalf of the State of California. I have fairly represented the other employees and the State throughout this lawsuit. I don't have any disagreements with the other OMEGA 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 this 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 OMEGA. 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 this 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.

5. The PAGA statute does not forbid enhancement awards. Courts frequently award them in PAGA-only cases as well. Although I did not keep official time records, I spent

1 at least 10-15 hours prosecuting this case, including but not limited to, hiring my attorneys,
2 speaking with my attorneys on many occasions by phone, explaining what my employment at
3 OMEGA was like, explaining what my employment at OMEGA had in common with other
4 employees who worked for OMEGA, explaining my claims to my attorneys, providing
5 information as part of two separate mediations, preparing for and having my deposition taken,
6 and communicating with my attorneys about the settlement agreement and related documents.
7 In doing so, I have been exposed to significant risks, including the risk of an order to pay
8 Defendant's attorneys' fees and costs if this action had been unsuccessful and in bad faith. My
9 efforts and risks on behalf of the Aggrieved Employees shows that the proposed Enhancement
10 Award to me is fair, adequate, and reasonable.

11 6. Due to this, I am asking for \$10,000 towards an enhancement award for my
12 involvement and the time I spent assisting my counsel with the PAGA action.

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

16 Executed on 06/26/2026 in Riverside, California.

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18 ID yjuRoBnZjINKDrPzq3dNCh4Z

19 Jessica Gascon,
20 Declarant
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I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 101 N. Brand Blvd, Suite 1450, Glendale, CA 91203.

Christina Loni
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Keith E. Smith
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WOOD SMITH HENNING & BERMAN LLP

(BY MAIL) I caused such envelope to be deposited in the mail at Glendale, California. The envelope was mailed with postage thereon fully paid. As follows: I am “readily familiar” with the firm’s practice of collection and processing correspondence from mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Glendale, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

X **(BY ELECTRONIC TRANSMISSION)** I caused such document to be delivered via electronic transmission to the addressee(s) listed above.

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

/s/Yervand Boyajyan
Yervand Boyajyan, Esq.