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8 Attorneys for Plaintiff,

9 NATHALIE BARCENAS, and all others similarly situated

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF ORANGE**

12 **(UNLIMITED JURISDICTION)**

13 NATHALIE BARCENAS, as an “aggrieved
14 employee” on behalf of herself and other
15 similarly situated “aggrieved employees”
16 under the Labor Code Private Attorneys
17 General Act of 2004,

18 *Plaintiff,*

19 vs.

20 EL TORO MEAT SHOP; EULOGIO
21 BONILLA; and DOES 1 to 25, inclusive,

22 *Defendants.*

Case No.: 30-2023-01351414-CU-OE-CXC

**SUPPLEMENTAL DECLARATION OF
NATHALIE BARCENAS IN SUPPORT OF
PLAINTIFF’S MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

*Assigned for All Purposes to
Hon. Layne H. Melzer, Department CX102*

Action filed: 09/27/2023

Hearing Date: 08/21/2025

Hearing Time: 2:00 p.m.

Hearing Dept: CX102

SUPPLEMENTAL DECLARATION OF NATHALIE BARCENAS IN SUPPORT OF
PAGA SETTLEMENT AND RELEASE

I, NATHALIE BARCENAS, declare and state 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 Maralle Messrelian of MM Law, APC 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 am making this sworn supplemental declaration in support of my claims and in support of my qualifications as Plaintiff and request for an Enhancement Payment.

3. I have spent significant time throughout this Action working with PAGA Counsel, approximately 14-15 hours. I first contacted PAGA Counsel in June of 2023 and have been actively involved throughout the pendency of the Action . I have assisted my attorney with investigation and gathering of information before initiating the lawsuit including discussing my work experience and the experience of others that I had observed while working for Defendant El Toro Meat Shop (“El Toro”) and provided all relevant employment documents in my possession.

4. Once the lawsuit started, I continued to assist and be involved. I had several phone calls with my lawyer and the legal assistant to assist and to get updates on the case. On the day of the mediation, I stayed available all day and had discussions with my counsel and the legal assistant and shared my knowledge and insights in order to help all of the Aggrieved Employees obtain a favorable settlement. I also reviewed the settlement agreement and my initial declaration in support of the settlement as well as this supplemental declaration before signing it. I accepted the settlement only after I had spent time evaluating the proposed outcome to assure that it was fair and once PAGA Counsel explained in detail how the settlement would work.

5. Throughout the entirety of this litigation, I have maintained regular contact with PAGA Counsel and assisted in any way possible by providing information and making myself available as needed.

6. I was aware that by helping to initiate this lawsuit, my name would become known and it was possible that my involvement in this matter could make it more difficult for me to obtain employment in this field. Regardless, I believed it was important to proceed with this matter on my behalf and on behalf of all others who were subject to the same problems during their employment with El Toro.

7. Based upon my participation in this case, I understand the merits of this settlement and I strongly support the settlement and believe it is fair and reasonable, and in the best interest of the Aggrieved Employees. I believe this Settlement will benefit the Aggrieved Employees.

8. Based on the time I have spent on the lawsuit, the risk I will have to pay El Toro's court costs if I lose, the harm to my chances of getting jobs in the future, the additional time I will have to wait to receive the Enhancement Payment after approval (due to the settlement payment plan), and my general release of all claims, whether known or unknown, that I may have against Defendant (not only PAGA claims), my request for an Enhancement Payment of \$10,000 is fair and reasonable.

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 5, 2025 at Santa Ana, California.

Nathalie Mariela Bárcenas
Nathalie Mariela Bárcenas (Aug 5, 2025 11:53:37 PDT)

NATHALIE BARCENAS,
Declarant