

MARALLE MESSRELIAN (SBN 316974)

maralle@mmlawapc.com

MM LAW, APC

500 N. Brand Blvd., Suite 2000

Glendale, CA 91203

Telephone (818) 810-7747

Facsimile (818) 230-9018

Attorneys for Plaintiff,

RUBEN ORTIZ SALGADO, and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT

(UNLIMITED JURISDICTION)

RUBEN ORTIZ SALGADO, on behalf of
himself and all others similarly situated, and
the general public, and as an “Aggrieved
Employee” on behalf of other “Aggrieved
Employees” under the Private Attorneys
General Act of 2004,

Plaintiff(s),

vs.

BOB BAFFERT RACING, INC., a
California corporation; and DOES 1 to 25,
inclusive,

Defendants.

Case No.: 24STCV00686

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

Action filed: 1/9/2024
Hearing Date: 03/06/2025
Hearing Time: 9:00 a.m.
Hearing Dept: SSC-6, Hon. Elihu M.
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1 **SUPPLEMENTAL DECLARATION OF MARALLE MESSRELIAN IN SUPPORT OF**
2 **PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF**
3 **JOINT STIPULATION OF CLASS ACTION AND PAGA SETTLEMENT**

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 Ruben Ortiz Salgado (“Plaintiff”) in his lawsuit against
7 Defendant Bob Baffert Racing, 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 3. A true and correct copy of the First Amended Joint Stipulation of Class Action
12 and PAGA Settlement and Release (“Amended Settlement”) is attached hereto as **Exhibit 9**.

13 4. A true and correct copy of the redline comparison of the changes made to the
14 Amended Settlement is attached hereto as **Exhibit 10**.

15 5. A true and correct copy of the amended Notice Of Class Action (“Amended
16 Notice”) is attached hereto as **Exhibit 11**.

17 6. A true and correct copy of the redline comparison of the changes made to the
18 Amended Notice is attached hereto as **Exhibit 12**.

19 ***Notice of Settlement to the LWDA***

20 7. Pursuant to Labor Code § 2699(1)(2), Plaintiff submitted a copy of the
21 Amended Settlement with the Labor and Workforce Development Agency (“LWDA”) at the
22 same time Plaintiff’s supplemental briefing is being filed with the Court. A true and correct
23 copy of Plaintiff’s submission with the LWDA and a confirmation email is attached hereto as
24 **Exhibit 13**.

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

27 Executed on Monday, February 24, 2025 at Glendale, California.

28 
MARALLE MESSRELIAN,
Declarant