

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,

NORIELL HOFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF RIVERSIDE

(UNLIMITED JURISDICTION)

NORIELL HOFF, individually, and on
behalf of other aggrieved employees
pursuant to the Labor Code Private
Attorneys General Act of 2004,

Plaintiff,

vs.

ANTHEM MECHANICAL, a California
corporation; MICHAEL SOLOMON, an
individual; and DOES 1 to 25, inclusive,

Defendant(s).

Case No.: CVRI2401199

*Assigned for All Purposes to
Hon. Harold W. Hopp in Department 1*

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

Action filed: 3/1/2024
Hearing Date: 06/03/2025
Hearing Time: 8:30 a.m.
Hearing Dept: 1

1 **SUPPLEMENTAL DECLARATION OF MARALLE MESSRELIAN IN SUPPORT OF**
2 **PLAINTIFF'S UNOPPOSED MOTION FOR APPROVAL OF PAGA SETTLEMENT**

3 I, MARALLE MESSRELIAN, declare as follows:
4

5 1. I am an attorney duly licensed to practice law in the State of California and am
6 an attorney of record for Noriell Hoff (individually, "Hoff" or "Plaintiff") in his lawsuit
7 against Defendants Anthem Mechanical and Michael Solomon (collectively "ANTHEM" or
8 "Defendants").

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. In its tentative ruling dated May 7, 2025, the Court requested more information
12 and identified amendments needed before the Court could grant approval of the PAGA
13 Settlement. The Court requested that these issues be addressed with supplemental briefing due
14 May 29, 2025, with a continued hearing to be held on June 3, 2025.

15 4. A true and correct copy of the First Amended PAGA (Private Attorneys
16 General Act, Labor Code § 2698 *et seq.*) Settlement Agreement and Release ("Amended
17 Settlement") is attached hereto as **Exhibit 11**.

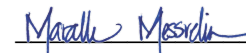
18 5. A true and correct copy of the redline comparison of the changes made to the
19 Amended Settlement is attached hereto as **Exhibit 12**.

20 ***Notice of Settlement to the LWDA***

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

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

28 Executed on Friday, May 23, 2025 at Glendale, California.


MARALLE MESSRELIAN,
Declarant