

**BLUEMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

Norman B. Bluementhal (State Bar #068687)
Kyle R. Nordrehaug (State Bar #205975)
Aparajit Bhowmik (State Bar #248066)
2255 Calle Clara
La Jolla, CA 92037
Telephone: (858)551-1223
Facsimile: (858) 551-1232
Email: Kyle@bamlawca.com
Website: www.bamlawca.com

GOMEZ TRIAL ATTORNEYS

Emilia A. Arutunian, Esq. (SBN #305824)
755 Front Street
San Diego, CA 92101
Telephone: (619) 237-3490
Facsimile: (619) 237-3496
Email: mila@getgomez.com

Attorney for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

HIRSI MURSAL, an individual, on behalf of
himself and on behalf of all persons similarly
situated,

Plaintiffs,

vs.

TORAY MEMBRANE USA, INC., a
California Corporation; and DOES 1 through
50, inclusive,

Defendants.

CASE NO.: **37-2024-00001450-CU-OE-CTL**

**DECLARATION OF EMILIA A.
ARUTUNIAN IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL**

Hearing Date: January 24, 2025
Hearing Time: 9:10 a.m.

Judge: Hon. Judy S. Bae
Dept.: 62

Date Action Filed: January 12, 2024
Trial Date: Not set

DECLARATION OF EMILIA A. ARUTUNIAN

1 I, Emilia A. Arutunian, declare:

2 1. I am an attorney at law duly admitted to practice before all the courts of the State of
3 California and an attorney of record for Plaintiff Hirsi Mursal ("Plaintiff") in this matter. I have
4 personal knowledge of the facts set forth in this declaration, and if called as a witness, could and
5 would testify as to their accuracy.

6 2. I am making this declaration on behalf of my client, the named Plaintiff, the
7 putative class members, and in support of Plaintiff's Motion for Preliminary Approval of Class
8 Action Settlement ("Motion").

9 3. I am a seasoned litigation and trial attorney who has litigated numerous wage- and-
10 hour class action cases, both for Defendants and for Plaintiffs. I have practiced California
11 employment law for several years, including individual and representative actions on behalf of
12 both employers and employees. I have worked on numerous class action cases in California, and
13 in federal courts in other states since 2019.

14 4. I graduated with a Bachelor of Arts degree from San Diego State University in
15 2012, magna cum laude, with a major in Political Science, and a double minor in Russian and
16 Interdisciplinary studies. I received my Juris Doctorate from University of San Diego School of
17 Law in 2015. During law school, I externed for Chief Judge Larry Alan Burns, of the U.S. District
18 Court for the Southern District of California.

19 5. My office has worked on this matter over the course of litigation since the filing
20 of this lawsuit.

21 6. I have had class action litigation experience mostly in the area of employment
22 class actions. I have experience in cases involving labor code violations and wage and hour
23 claims. I have litigated similar wage and hour cases against other employers on behalf of
24 employees. I have been approved as class counsel in California courts. It is this level of
25 experience which enabled my firm to undertake the instant matter to successfully combat the
26 resources of the defendant and its capable and experienced counsel.

27 I declare under penalty of perjury under the laws of the state of California that the

28
DECLARATION OF EMILIA A. ARUTUNIAN

1 foregoing is true and correct.

2

3 Executed on December 27, 2024

4

Emilia Arutunian

5

Emilia A. Arutunian, Esq.

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

DECLARATION OF EMILIA A. ARUTUNIAN