

1 John G. Yslas (SBN 187324)
2 john.yslas@wilshirelawfirm.com
3 Diego Aviles (SBN 315533)
4 diego.aviles@wilshirelawfirm.com
5 Harry Erganyan (SBN 333091)
6 harry.erganyan@wilshirelawfirm.com
7 Mariam Nazaretyan (SBN 334154)
8 mariam.nazaretyan@wilshirelawfirm.com
9 Emily K. Borman (SBN 303180)
10 emily.borman@wilshirelawfirm.com
11 Courtney M. Miller (SBN 327850)
12 courtney.miller@wilshirelawfirm.com
13 **WILSHIRE LAW FIRM, PLC**
14 660 S. Figueroa Street, Sky Lobby
15 Los Angeles, California 90017
16 Telephone: (213) 381-9988
17 Facsimile: (213) 381-9989

18 Attorneys for Plaintiffs
19 WILLIAM MORENO, LIZBETH GONZALEZ
20 VELAZQUEZ, and SARAH SANDOVAL

21 *[Additional Counsel Next Page]*

22 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

23 **FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**

24 WILLIAM MORENO, LIZBETH GONZALEZ
25 VELAZQUEZ, SARAH SANDOVAL,
26 MUSTAFA ALKARKHI, JACOB TERRY,
27 and RALPH HERNANDEZ, individually, and
28 on behalf of all others similarly situated,

Plaintiffs,

v.

ABC PHONES OF NORTH CAROLINA, INC.
DBA VICTRA, a North Carolina corporation;
and DOES 1 through 10, inclusive,

Defendants.

Case No.: 23STCV31717
Related Case No.: 24STCV09415
Related Case No.: 24STCV12066

*[Assigned for All Purposes to the Hon. Elihu
M. Berle, Dept. 6]*

**DECLARATION OF RALPH
HERNANDEZ IN SUPPORT OF
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing Information:
Date: April 22, 2026
Time: 9:00 a.m.
Dept: 6

Mehrdad Bokhour, Esq. (SBN 285256)

mehrdad@bokhourlaw.com

BOKHOUR LAW GROUP, P.C.

1901 Avenue of the Stars, Suite 450

Los Angeles, California 90067

Telephone: (310) 975-1493

Facsimile: (310) 675-0861

Joshua S. Falakassa, (SBN 295045)

josh@falakassalaw.com

FALAKASSA LAW, P.C.

1901 Avenue of the Stars, Suite 450

Los Angeles, California 90067

Telephone: (818) 456-6168

Facsimile: (888) 505-0868

Attorneys for Plaintiff

MUSTAFA ALKARKHI

Joseph Lavi, Esq. (SBN 209776)

jlavi@lelawfirm.com

Vincent C. Granberry, Esq. (SBN 276483)

vgranberry@lelawfirm.com

Jovahn Wiggins, Esq. (SBN 349903)

jwiggins@lelawfirm.com

Monique N. Toby, Esq. (SBN 365937)

mtoby@lelawfirm.com

LAVI & EBRAHIMIAN, LLP

8889 W. Olympic Boulevard, Suite 200

Beverly Hills, California 90211

Telephone: (310) 432-0000

Facsimile: (310) 432-0001

Attorneys for Plaintiff

RALPH HERNANDEZ

Harout Messrelian, Esq. (SBN 272020)

hm@messrelianlaw.com

MESSRELIAN LAW INC.

101 N. Brand Blvd., Suite 1450

Glendale, California 91203

Telephone: (818) 484-6531

Facsimile: (818) 956-1983

Attorneys for Plaintiff

JACOB TERRY

DECLARATION OF RALPH HERNANDEZ

I, Ralph Hernandez, declare:

1. I am over the age of 18 and am a named Plaintiff and class representative in this matter. I have personal knowledge of the matters stated herein and if called and sworn as a witness, I would and could competently testify under oath thereto.

2. This declaration is submitted in support of Preliminary Approval of the Class Action and PAGA Settlement in this matter.

3. I worked for Defendant ABC PHONES OF NORTH CAROLINA, INC. DBA VICTRA. ("Defendant"), as an hourly, non-exempt employee from in or around June 16, 2023, until on or about May 16, 2024.

4. From the time of the filing of the lawsuit, I have understood that this is a class action lawsuit (the "Class Complaint") where I represent the interests of all hourly, non-exempt employees of Defendant who worked for Defendant in California during the Class Period of December 19, 2019, through April 14, 2026. ("Class Members").

5. I believe while working for Defendant, I and all hourly, non-exempt employees of Defendant who worked for Defendant in California during the Class Period, were subject to the same policies and procedures regarding payment of minimum and overtime wages, meal and rest breaks, meal and rest break premiums, final payment of wages, wages statements, indemnification for business related expenses, and production of employment records. I believe that the claims of all hourly, non-exempt employees of Defendant who worked for Defendant in California during the Class Period, are identical to mine because Defendant's policies and procedures applied to all of us.

6. I understand that I must continue to consider and protect the interests of all hourly, non-exempt employees of Defendant who worked for Defendant in California during the Class Period. I have been protecting the rights of myself and all hourly, non-exempt employees of Defendant who worked for Defendant in California during the Class Period, since approximately May 2024 when first I started looking for an attorney before this lawsuit was filed. I have been and continue to place the interests of all hourly, non-exempt employees of Defendant who worked

1 for Defendant in California during the Class Period before my own. I do not have any interests that
2 conflict with those of other Class Members.

3 7. I provided information and made myself available to my attorneys since
4 approximately May 2024 when I was searching for my attorney. I have helped and been willing to
5 support the lawsuit in any way I can for the last approximately 20 months since May 2024 when I
6 began searching for an attorney for the claims in this lawsuit. I have searched for an attorney, met
7 with my attorneys to see if they would represent me, met with my attorneys to discuss the
8 Defendant's policies, procedures, and practices for clocking in and out, paying wages for the hours
9 that we worked, wage statements, and final payment of wages. I spent time searching for policies
10 and procedures that were given to me during my employment, any timecards I had, any pay stubs I
11 had, handbooks and other documents related to my employment. I produced all the documents to
12 my attorneys. I responded to almost all of my attorneys' telephone calls and interviews and I met
13 with them in person and/or telephonically to discuss any questions they had about my
14 employment, Defendant's policies and procedures, and Defendant's payment of wages, providing
15 wage statements, termination of employees, or the documents I had provided to them. I was
16 available during the full day mediation in this case. Once the settlement agreement was finalized, I
17 conferred with my attorneys on multiple occasions to review and discuss the settlement agreement
18 before signing.

19 8. I also understand that in the event this matter proceeds to trial, I must come to court
20 to participate in the trial. I will come to court if I am needed and have been ready to perform any
21 responsibility that is necessary for this lawsuit. I know that I took a risk by filing this lawsuit
22 because if I lost, I would have to pay for all the costs incurred by the Defendant in the lawsuit. I
23 also have the risk of losing income for any time that I would have to spend fulfilling my
24 responsibilities including having to attend the trial. I also believe I have taken a risk by filing this
25 lawsuit because my employers in the future may find out that I sued my employer, and they may
26 not like it. The other employees will be receiving money from this lawsuit, and they have not had
27 to file a lawsuit, look for an attorney, or take the risks that I have had to take.

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9. I understand that the settlement we have reached in this case must be approved by the Court and I must protect the interests of all hourly, non-exempt employees of Defendant who worked for Defendant in California during the Class Period.

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

Executed this 26th day of February 2026, in Riverside, California.

Ralph Hernandez
Ralph Hernandez