

MESSRELIAN LAW INC.

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Attorneys for Plaintiff, JACOB TERRY

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

WILLIAM MORENO, LIZBETH
GONZALEZ VELAZQUEZ, SARAH
SANDOVAL, MUSTAFA ALKARKHI,
JACOB TERRY, and RALPH
HERNANDEZ, individually, and 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 HAROUT
MESSRELIAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Preliminary Approval Hearing:

Date: April 22, 2026

Time: 9:00 a.m.

Dept: 6

Action Filed: December 28, 2023

DECLARATION OF HAROUT MESSRELIAN

I, HAROUT MESSRELIAN, declare and state as follows:

1. I am an attorney duly licensed to practice before all the Courts of the State of California. I am the managing attorney of Messrelian Law Inc. and the attorney of record for Plaintiff Jacob Terry. This Declaration is submitted in support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I am experienced in handling employment law matters and specifically wage and hour representative and individual actions. My qualifications are as follows: I received my JD from Loyola Law School in 2010. I started my own law firm in 2011 – the Law Offices of Harout Messrelian. Since 2016, I have been the founder and principal attorney at Messrelian Law, Inc. Since 2011, I have filed and handled over 350 civil actions and/or claims involving representative actions under the Private Attorneys General Act ("PAGA") and/or wage and hour claims on behalf of my clients and have been appointed Class Counsel in the following class action cases – *Zohrab Mekhitarian v. Triple Play Motors dba Bob Smith Toyota*, Los Angeles Superior Court Case No. 19STCV22411 (ADR Services, Inc., Case Number 20-2668-RWT); *Carina Camberos, on behalf of herself and others similarly situated, v. Great American Chicken Corp, Inc.*, Los Angeles Superior Court Case No. 21STCV32015; *Robert Garcia, on behalf of himself and others similarly situated v. HD Supply Management Inc.*, San Bernardino Superior Court Case No. CIVSB202806; and *Alfredo Betancourt v. L3 Technologies, Inc.*, San Mateo County Superior Court, Case no. 23-CIV-05704 (appointed Class Counsel and granted final approval of class action settlement by the court). I have a practice that encompasses cases in the Los Angeles Superior Courts, the Orange County Superior Courts, the Riverside County Superior Courts, the San Bernardino County Superior Courts, the Alameda County Superior Courts, Santa Clara County Superior Courts, San Mateo County Superior Courts, and the Monterey County Superior Courts.

3. On February 16, 2024, Plaintiff Terry sent a letter to the Labor Workforce Development Agency ("LWDA") alleging that Defendant violated various labor code sections related to payment of wages, meal/rest breaks, and similar violations. Pursuant to Labor Code §

1 2699.3, subd.(a), Plaintiff Terry gave timely written notice to Defendant and the LWDA by
2 sending the PAGA Notice.

3 4. On or around May 14, 2024, Plaintiff Terry commenced an Action by filing a
4 Complaint styled *Jacob Terry v. ABC Phones of North Carolina, Inc.*, in Los Angeles Superior
5 Court, Case Number 24STCV12066, alleging a single cause of action against Defendant for
6 Private Attorneys General Act ("PAGA").

7 5. Plaintiff Terry was thereafter added as a Plaintiff in the instant case through
8 the filing of a consolidated First Amended Class Action and PAGA Complaint on November 21,
9 2025.

10 6. Myself and the other Plaintiffs' attorneys in this case are experienced in
11 prosecuting class and PAGA lawsuits. Counsel for Defendant is experienced in defending class
12 and PAGA cases. Based on my own independent investigation and evaluation, I am of the opinion
13 that the Settlement for the consideration and on the terms set forth in the Agreement are fair,
14 reasonable and adequate and are in the best interests of Plaintiffs, the putative class members, the
15 Aggrieved Employees, the State, and Defendant in light of all known facts and circumstances and
16 the risks inherent in litigation.

17 7. I do not have any personal and/or financial involvement or relationship with the
18 Class Action Administrator in this matter, Phoenix Class Action Administrators.

19 8. Co-counsels have executed a Joint Prosecution Agreement to which Plaintiff Jacob
20 Terry has provided express written consent to a fee splitting agreement between co-counsels as
21 follows: 50% to Wilshire Law Firm, PLC; 15% to Bokhour Law Group, P.C.; 15% to Falakassa
22 Law, P.C.; 10% to Lavi & Ebrahimi, LLP; and 10% to Messrelian Law Inc.

23 I declare under the penalty of perjury of the laws of the State of California that the
24 foregoing is true and correct to the best of my knowledge. Executed on February 26, 2026, at
25 Glendale, California.

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28 HAROUT MESSRELIAN, Declarant