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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF RIVERSIDE**

11 **(UNLIMITED JURISDICTION)**

12 ALEXANDRA WOOD,

13 Plaintiff,

14 vs.

15 TMCSF, INC. and DOES 1 to 25, inclusive

16 Defendants.

Case No.: CVRI2403906

17 **DECLARATION OF ALEXANDRA WOOD**
18 **IN SUPPORT OF PLAINTIFF'S MOTION**
19 **FOR APPROVAL OF PAGA SETTLEMENT**

Hearing Date: July 14, 2026

Hearing Time: 8:30 a.m.

Hearing Dept: 1, Hon. Harold W. Hopp

20 Submitted Herewith Under Separate Cover:

- 21 1. Plaintiff's Notice of Unopposed Motion and
- 22 Motion for Approval of PAGA Settlement;
- 23 2. Declaration of Harout Messrelian;
- 24 3. Declaration of Michael Sutherland;
- 25 4. [Proposed] Order

**DECLARATION OF ALEXANDRA WOOD IN SUPPORT OF
PLAINTIFF'S MOTION FOR APPROVAL OF PAGA SETTLEMENT**

I, ALEXANDRA WOOD, declare and state as follows:

1. I am a resident of the State of California and am over 18 years of age. I am the named Plaintiff in this action and am represented by Harout Messrelian of Messrelian Law, Inc. in this action. Except as otherwise stated, I have personal knowledge of all matters set forth in this declaration and could and would competently testify thereto if called upon to do so as a witness.

2. I first started working for Defendant on or around April 24, 2022 in the marketing department. My employment with Defendant ended on or around March 29, 2024.

3. I understand that this lawsuit is a Private Attorney General action, otherwise known as a PAGA lawsuit. I understand that I am the Plaintiff and that TMCSF, INC. doing business as Riverside Harley Davidson ("RSHD" or "Defendant") is the Defendant. I understand that my name is on the cover of the lawsuit. I understand that I am the representative of other RSHD employees. As the representative in this lawsuit, I have duties to the State of California and other employees like me who were not provided all required meal and rest periods. I also understand that my lawsuit is on behalf of the State of California. I have fairly represented the other employees and the State throughout this lawsuit. I don't have any disagreements with the other RSHD employees I represent. I am not aware of any reason why I can't make the best decisions for them in this lawsuit.

4. When I agreed to hire my attorneys to file this lawsuit, I also agreed that I would be the representative of the other employees and the State of California. I agreed that the interests of the other employees and the State in the lawsuit are as important as my personal interests in suing RSHD. I agreed that I would do what is in the best interests of the other employees and the State when deciding whether or not to settle this lawsuit. I also agreed to actively participate in the lawsuit. I also understand that there will only be a settlement of the lawsuit if the Court allows it.

5. The PAGA statute does not forbid service awards. Courts frequently award them in PAGA-only cases as well. The work I have done on this case includes hiring my attorneys, speaking with my attorneys on many occasions by phone, explaining what my employment at RSHD was like, explaining what my employment at RSHD had in common with other

1 employees who worked for RSHD, explaining my claims to my attorneys, providing documents
2 to my attorneys to help in prosecuting the PAGA claim, participating in the mediation on the
3 case, communicating with my attorneys about the settlement agreement and related documents,
4 and reviewing the settlement agreement. Despite this, I am **not** asking for a service award for
5 my involvement and the time I spent assisting my counsel with the PAGA action.

6 6. I negotiated a confidential individual settlement of my sexual harassment and
7 wrongful constructive discharge claims, which were filed in a separate action in Riverside
8 Superior Court, *Alexandra Wood v. TMCSF, Inc.*, Court Case No. CVRI2403902. As part of my
9 individual settlement, I signed a general release of all claims, which will be triggered upon court
10 approval of the PAGA settlement. I don't believe that my individual settlement has any bearing
11 on whether I have served the Aggrieved Employees' best interests and will continue to do so.

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

14 Executed on April 30th, 2026 at Riverside, California.

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17 ALEXANDRA WOOD,
18 Declarant
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