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ILSE HERNANDEZ, and all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF SOLANO**
**(*UNLIMITED JURISDICTION*)**

ILSE HERNANDEZ,

*Plaintiff*,

vs.

PAVILIONS MANAGEMENT, LLC; ALADDIN SAMMAKIEH; and DOES 1 to 25, inclusive,

*Defendants*.

Case No.: CU24-07673

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

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| Action filed: | October 2, 2024 |
| Hearing Date: | May 11, 2027 |
| Hearing Time: | 9:00 a.m. |
| Hearing Dept: | 3, Hon. Stephen Gizzi |

## DECLARATION OF MARALLE MESSRELIAN

1. I am an attorney duly licensed to practice law in the State of California and am an attorney of record for Plaintiff Ilse Hernandez (individually, "Hernandez" or "Plaintiff") in her lawsuit against Defendants Pavilions Management, LLC and Aladdin Sammakieh ("Defendants" or "PAVILIONS").

2. Except as otherwise indicated, I have personal knowledge of all matters set forth herein and, if called as a witness, could and would competently testify thereto under oath.

***Background***

3. In 2003, I earned a Bachelor of the Science degree with a major in Accounting from Cal State University, Northridge. In 2017, I earned a Juris Doctor degree from Southwestern University School of Law.

4. In December of 2017, the Supreme Court for the State of California admitted me as an Attorney and Counselor at Law and licensed me to practice law in all the Courts of this State.

5. I am experienced in handling employment law matters and specifically wage and hour class action and representative action cases. I have been practicing law since 2017. My experience has been almost exclusively in the area of employment law representing employees with claims of wrongful termination, harassment, whistleblower retaliation, discrimination, wage and hour, and family and medical leave violations. I am a member of the California Employment Lawyers Association (CELA).

6. In my representation of employees, I have prosecuted several lawsuits on behalf of employees with claims of rest and meal period and overtime violations or other wage claims.

7. I have been involved in the prosecution of numerous wage and hour class and representative actions at various stages of litigation. A small sampling of the wage and hour class and representative action cases in which I have been counsel of record is as follows:

a) *Joshua Silva v. Payo Laboratories, Inc*., *et al*., San Luis Obispo County Superior Court, Case No. 19CV-0689 (appointed Class Counsel and granted final approval of class action settlement by the court).

b) *Mervin Perkins v. CC Venice, LLC, et al.,* Los Angeles Superior Court, Case

No. BC703660 (appointed Class Counsel and granted final approval of class action settlement by the court).

c) *Jashar Bryant v. Pinnacle Cabling & Construction, Inc., et al*., Orange County Superior Court, Case No. 30-2020-01123094-CU-OE-CXC (appointed Class Counsel and granted final approval of class action settlement by the court).

d) *Collins v. Spa Products Import & Distribution Co., LLC*, et al., Los Angeles County Superior Court, Case No. 19STCV10586 (granted final approval of class action settlement by the court)

e) *Sabrina Slater v. Avalon Care Center – Sonora, L.L.C., et al*., Tuolumne County Superior Court, Case No. CV62006 (granted final approval of class action settlement by the court)

f) *Violet Avalos v. Smithcare Incorporated, et al*., Tulare County Superior Court, Case No. VCU272975 (granted final approval of class action settlement by the court)

g) *David Contreras v. HTX Services LLC, et al*., Los Angeles County Superior Court, Case No. 19STCV43405 (granted final approval of class action settlement by the court)

h) *Devin Cherry v. LA Corral Three, Inc., et al.,* Kern County Superior Court, Case No., BCV-18-101817-DRL (granted final approval of class action settlement by the court)

i) *Vikki Curl and Anthony J. Gratton v. Reel Security Corp., et al.,* Los Angeles County Superior Court, Case No. 18STCV09302 (granted final approval of class action settlement by the court)

j) *Corrine Lashbrook and Joshua Sweat v. Andy's BP, Inc., et al.,* San Mateo County Superior Court, Case No. 19CIV02344 (granted final approval of class action settlement by the court)

k) *Stephen Aguirre and Christopher Walls v. Anlin Industries*, Fresno County Superior Court, Case No. 17CECG04326 (order and judgment approving PAGA settlement by the court)

l) *Rebecca Mallory v. Odyssey Healthcare Operating A, L.P*., Kern County Superior Court, Case No. BCV-19-102735 (order and judgment approving PAGA settlement by the court)

m) *Wendy Chavez v. Texas De Brazil (Fresno) Corporation, et al*., Fresno County Superior Court, Case No. 19CECG04249 (order and judgment approving PAGA

settlement by the court)

n) *Kevin Littleton v. Lincoln Military Property Management LP*., San Diego County Superior Court, Case No. 37-2018-00061799-CU-OE-NC (order and judgment approving PAGA settlement by the court)

o) *Krystal Thomas v. Choice Physicians Network, Inc., et al*., San Bernardino County Superior Court, Case No. CIVDS2013964 (order and judgment approving PAGA settlement by the court)

p) *Otina Sengvong v. Probuild Company, LLC, et al*., United States District Court, Southern District of California, Case No. 3:19-cv-02231-MMA (JLB) (granted final approval of class action settlement by the court)

q) *Orland Perez Avalos v. Milagros Restaurant LLC, et al*., San Mateo County Superior Court, Case No. 22-CIV-01222 (order and judgment approving PAGA settlement by the court)

r) *David Xiqui Vasquez v. The Province LLC, et al*., Santa Clara County Superior Court, Case No. 22CV397541 (order and judgment approving PAGA settlement by the court)

s) *Manuel Melendrez v. Clean Auto Inc., et al*., San Mateo County Superior Court, Case No. 22CIV01967 (order and judgment approving PAGA settlement by the court)

t) *Arturo Vera Lopez v. Green Valley Landscape, et al*., Monterey County Superior Court, Case No, 22CV003751 (order and judgment approving PAGA settlement by the court)

u) *Erasmo Gomez v. A-1 Jay's Machining, Inc., et al*., Santa Clara County Superior Court, Case No. 22CV394795 (order and judgment approving PAGA settlement by the court)

v) *Iris Rodriguez v. Facility Masters, Inc*., Santa Clara County Superior Court, Case No. 23CV423999 (order and judgment approving PAGA settlement by the court)

w) *Mariana Ruelas v. Vista La Mesa Senior Living, Inc., et al*., San Diego Superior Court, Case No. 37-2023-00050755-CU-OE-CTL (order and judgment approving PAGA settlement by the court).

x) *Jose Angel Lopez v. Moreno & Associates, Inc., et al*., Santa Clara Superior Court, Case No. 23CV422622 ( order and judgment approving PAGA settlement by the court).

y) *Irma Tapia v. Posada Associates, et al*., Santa Cruz Superior Court, Case No. 23CV00355 (order and judgment approving PAGA settlement by the court).

z) *Andres Ibarra v. Stadco*, et al. Los Angeles Superior Court, Case No. 23STCV26591 (order and judgment approving PAGA settlement by the court).

aa) *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).

bb) *Eduardo Martinez Guizar v. Air Culinaire Worldwide, LLC*, Santa Clara County Superior Court, Case No. 23CV415879 (order and judgment approving PAGA settlement by the court).

cc) *Jesse Altamirano v. Weber Metals, Inc*., Los Angeles Superior Court, Case No. 24STCV05326 (order and judgment approving PAGA settlement by the court).

dd) *Noriell Hoff v. Anthem Mechanical, et al*., Riverside County Superior Court, Case No. CVRI2401199 (order and judgment approving PAGA settlement by the court).

ee) *Lukas Javier v. Hyatt Corporation dba The Seabird*, San Diego County Superior Court, Case No. 37-2024-00018273-CU-OE-NC (order and judgment approving PAGA settlement by the court).

ff) *Nathalie Barcenas v. El Toro Meat Shop*, Orange County Superior Court, Case No. 30-2023-01351414-CU-OE-CXC (order and judgment approving PAGA settlement by the court).

gg) *Ruben Ortiz Salgado v. Bob Baffert Racing, Inc.*, Los Angeles County Superior Court, Case No. 24STCV00686 (appointed Class Counsel and granted final approval of class action settlement by the court).

hh) *Edgar Herrera v. Environmental Remedies, Inc., et al*., Alameda County Superior Court, Case No. 24CV092901 (order and judgment approving PAGA settlement by the court).

ii) *Sahid Irad Magana Segura v. DWH Restaurants, Inc., et al*., Santa Clara County Superior Court, Case No. 24CV428664 (order and judgment approving PAGA

settlement by the court).

jj) *Bethany Clayton, et al. v Saltie Girl LA LLC*, Los Angeles Superior Court Case No. 25STCV14374 (order and judgment approving PAGA settlement by the court).

kk) *Edilberto Paredes v. Heritage Landscape Services, Inc., et al*., San Diego Superior Court, Case No. 37-2024-00004064-CU-OE-CTL (appointed Class Counsel and granted final approval of class action settlement by the court).

ll) *Cruz De Leon Serrano, et al. v. Kohana Coffee, LLC, et al*., Contra Costa Superior Court, Case No. C24-02642 (appointed Class Counsel and granted final approval of class action settlement by the court).

mm) *Adolfo Lozoya Ramirez v. Bemus Landscape, Inc*., Los Angeles Superior Court, Case No. 24STCV08944 (order and judgment approving PAGA settlement by the court).

nn) *Noe Sandoval-Orozco v. Northwest Landscape Maintenance Company*, Santa Clara County Superior Court, Case No. 24CV445484 (appointed Class Counsel and granted final approval of class action settlement by the court).

8. I believe that the Settlement is fair, adequate, and reasonable. The Settlement provides substantial monetary benefits to the Aggrieved Employees and is a product of diligent efforts of PAGA Counsel to obtain the best possible result for the Aggrieved Employees. This Settlement was reached following thorough legal and factual research and analysis, thorough review of extensive data relative to the claims in the action, arduous settlement negotiations, and thorough investigation of the underlying facts by the respective parties and review of records. The settlement negotiations were, at all times, adversarial and non-collusive in nature. The proposed Settlement is within the range of reasonableness, and Aggrieved Employees have supported the Settlement.

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

Executed on October 12, 2026 at Glendale, California.

Maralle Messrelian

Maralle Messrelian,
Declarant