MESSRELIAN LAW INC.
Harout Messrelian, Esq. (SB# 272020)
hm@messrelianlaw.com
Maralle Messrelian, Esq., Of Counsel (SB#316974)
maralle@messrelianlaw.com
101 N. Brand Blvd., Suite 1450
Glendale, California 91203
Telephone: (818) 484-6531
Facsimile: (818) 956-1983

Attorneys for Plaintiff,
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 ILSE HERNANDEZ IN SUPPORT OF PLAINTIFF'S UNOPPOSED MOTION FOR APPROVAL OF PAGA SETTLEMENT

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

DECLARATION OF ILSE HERNANDEZ

I, ILSE HERNANDEZ , 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 PAVILIONS MANAGEMENT, LLC ("PAVILIONS") in or around June 2021 at a McDonald's restaurant located at 1602 E 2nd St, Benicia, CA 94510 as a crew member. My employment ended on or around June 19, 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 PAVILIONS MANAGEMENT, LLC and ALADDIN SAMMAKIEH are the Defendants. I understand that my name is on the cover of the lawsuit. I understand that I am the representative of other PAVILIONS employees. As the representative in this lawsuit, I have duties to the State of California and other employees like me who were not paid for all hours worked at the correct rates of pay, provided all required meal and rest periods, and reimbursed for necessary business expenses, such as uniforms, use of personal cell phones for work purposes, and masks. 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.

4. I understand that the Court will decide whether to approve the Settlement if it is in the best interests of Defendants' other hourly employees and the State. I don't have any disagreements with the other PAVILIONS employees I represent. I am not aware of any reason why I can't make the best decisions for them in this lawsuit.

5. I understand that my attorneys have asked the Court to pay me $2,000.00 as a Service Award for my contribution to this case, as well as for providing Defendants with a general release of all claims, whether known or unknown, I may have against Defendants, not

only PAGA claims. This is a significant sacrifice. I believe this amount is fair for the time I have spent and my involvement in this lawsuit. As part of this Settlement, I am giving up my right to sue Defendant for anything. I also believe it is fair because of the risk that the Court could order me to pay PAVILIONS's court costs if I lose the case. I think it is fair that the Court pay me the $2,000 award for these reasons and others I list below.

6. 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. In agreeing to be their representative, I agreed that the interests of the other employees and the State in the lawsuit are as important as my personal interests in suing PAVILIONS. I agreed that I would do what is in the best interest 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. As the representative of the other employees and the State of California, I have agreed to follow the progress of the lawsuit. I have done this since I hired my attorneys by reading the court documents they send me and by speaking with them over the phone.

7. 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 PAVILIONS was like, explaining what my employment at PAVILIONS had in common with other employees who worked for PAVILIONS, explaining my claims to my attorneys, speaking with the mediator during the mediation, and communicating with my attorneys about the settlement agreement and related documents. I have also carefully reviewed the Settlement Agreement and other documents to make sure that the Settlement and other work my attorneys performed are in the best interests of the employees I represent and the State of California.

8. Because I filed this lawsuit, there is a public record at the Court showing my name on the cover of the complaint for anyone to see. Any potential employer who finds the lawsuit will know I sued a former employer. This could hurt my reputation. This could prevent a potential employer from choosing to hire me. An award of $2,000.00 is not equal to the harm

I would suffer if I can't find another job in the future.

9. Based on the time I have spent on the lawsuit, the risk I will have to pay PAVILIONS's court costs if I lose, the harm to my chances of getting jobs in the future, and my agreement to give up any personal claims for unpaid wages and monetary penalties I have against PAVILIONS, my request for an award of $2,000 is fair and reasonable.

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 August 6, 2026 at Vallejo, California.

Ilse Hernandez
Ilse Hernandez (Aug 6, 2026 15:41:36 PDT)
ILSE HERNANDEZ,
Declarant