

MESSRELIAN LAW INC.

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Attorney for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF STANISLAUS

EDWARD GRAY and JESSICA MUTO,
individuals; on behalf of themselves, and on
behalf of all persons similarly situated,

Plaintiffs,

vs.

SKY HOTELS, INC., a California
corporation; MODCO 2, LLC, a California
limited liability company; and DOES 1-50,
inclusive,

Defendants.

Case No.: CV-22-004004

**DECLARATION OF HAROUT
MESSRELIAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: December 16, 2025
Time: 8:30 a.m.

Judge: Hon. John D. Freeland
Department: 23

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 Plaintiffs.

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. 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.

4. This Declaration is submitted in support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement.

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

8 6. I do not have any personal and/or financial involvement or relationship with the
9 proposed *cy pres* recipient, Community Law Project.

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

12 Executed on September 30, 2025, at Glendale, California.

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15 HAROUT MESSRELIAN,
16 Declarant
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