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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 FOR THE COUNTY OF MONTEREY

11
12 DINORA GONZALES and ANITA RAMOS,
as aggrieved employees pursuant to the Private
13 Attorneys General Act ("PAGA"), on behalf of
the State of California and other aggrieved
14 employees,

15 Plaintiffs,

16 vs.

17 GROWERS EXPRESS (DE), LLC, a Delaware
limited liability company; and DOES 1 through
18 10, inclusive,

19 Defendants.
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Case No. 20CV001103

**DECLARATION OF DINORA GONZALES IN
SUPPORT OF MOTION COURT APPROVAL
OF THE PARTIES' PAGA SETTLEMENT
AGREEMENT**

Date: April 6, 2021
Time: 8:30 a.m.
Place: Department 13

DECLARATION OF DINORA GONZALES

I, Dinora Gonzales, hereby declare as follows:

1. I am over eighteen years old and unless the context indicates otherwise, I have personal knowledge of the following facts and if called as a witness, I could and would testify competently to them. I am a Plaintiff in the above-captioned action, and a representative for the LWDA and Aggrieved Employees. I make this declaration in support of the Motion for Court Approval of the Parties' PAGA Settlement.

2. I was employed by Defendant Growers Express (DE), LLC ("Defendant" or "Growers Express") as a non-exempt General Laborer from approximately July 2015 to January 2019 at its facility in Gonzales, California. I decided to file this lawsuit to redress multiple employment-related grievances that I had against Defendant. These grievances are set forth in detail in my letter to the California Labor and Workforce Development Agency ("LWDA") and my Complaint.

3. Prior to filing the action, my attorneys and I had multiple conferences about the factual bases for the claims that I wanted to pursue against Defendant.¹ During those conferences, my attorneys provided me with an overview of how those claims would be litigated and generally educated me about the nature of complex/representative litigation and my role as the representative Plaintiff.

4. My attorneys provided me with a draft of the Complaint for my review and approval. I closely reviewed the Complaint to ensure accuracy and completeness. Following the filing of the Complaint, I collaborated with my attorneys on the prosecution of my claims, and I regularly contacted my attorneys to stay current on the status of the litigation, and to discuss my attorneys' progress in prosecuting the claims.

5. I worked closely with my attorneys during the discovery phase of the litigation, and in particular, I spent considerable time working with my attorneys to prepare responses to Defendant's discovery requests, including form interrogatories, special interrogatories, and document requests. I also made myself available to answer any questions my attorneys had stemming from Defendant's production of company documents.

¹ Although the preservation of my attorney-client privilege requires that I refrain from revealing the specifics of my communications with my attorneys, I understand that the privilege is not waived by stating generally the matters that I have discussed with my attorneys.

7. In summary, over the course of this litigation I have spent a significant amount of time conferring and working with my attorneys on the prosecution of my claims and evaluating the settlement and related documents. I estimate that I have spent between 30 and 40 hours assisting my attorneys in the prosecution of this lawsuit.

DocuSigned by:
Dinora Gonzales
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