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**SUPERIOR COURT OF STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE –CIVIL COMPLEX CENTER**

MARIA VELEZ, as an individual and on
behalf of other similarly situated employees,

Plaintiff,

vs.

LEGACY FARMS, LLC., a California
corporation, LEGACY FARMS OF
CALIFORNIA, LLC, a California corporation,
LEGACY FARMS EMPLOYMENT
SERVICES COMPANY, INC., a California
corporation, and PRIORITY WORKFORCE,
INC, a California corporation and DOES 1-50,
inclusive,

Defendants.

) Case No.: 30-2019-01120177-CU-OE-CXC

) Assigned for all Purposes to Honorable: Judge
) William Claster
) Dept. CX 104

) **DECLARATION OF MARIA VELEZ IN**
) **SUPPORT OF MOTION FOR ORDER**
) **APPROVING SETTLEMENT UNDER**
) **CALIFORNIA LABOR CODE SECTION**
) **2699 ET SEQ**

) **Hearing Date:**

) **Hearing Time:** 8:30 a.m.

) **Department:** CX104

) Case filed: December 23, 2019

) Trial date: TBD

**DECLARATION OF MARIA VELEZ IN SUPPORT OF MOTION FOR ORDER
APPROVING SETTLEMENT UNDER CALIFORNIA LABOR CODE SECTION 2699
ET SEQ**

1 I, Maria Velez, declare as follows:

2 1. I currently reside in California. I am over the age of eighteen and have personal
3 knowledge of everything stated below and could competently testify to these facts if sworn.

4 2. I submit this Declaration in support of the motion for approval of private attorney general
5 action claims and enhancement fee.

6 3. I worked for Defendants Legacy Farms, LLC, Legacy Farms of California, LLC, Legacy
7 Farms Employment Services Company, Inc., Priority Workforce, Inc., (“Defendants”). I worked
8 for Legacy Farms, LLC as an hourly worker. While working for LF I worked very hard and felt
9 that I was not being treated like a valued worker. After my employment ended with LF, I
10 determined that I would attempt to effectuate a change in LF’s practices and policies through a
11 representative action under the Private Attorney General Act. After consulting with a law firm, I
12 decided to file a class action and representative action claim against LF. I would consider myself
13 a lower wage hourly worker but despite this I still decided to take the risk of filing this
14 representative action and risk losing this case that could have exposed myself and my family to
15 certain attorneys’ fees and costs incurred by LF. However, my passion to vindicate the rights of
16 my coworkers outweighed the risk exposure to myself and my family as I believed that my co-
17 workers deserved to be treated fairly in the eyes of the law.

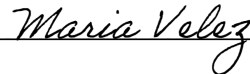
18 4. Throughout this case, I was required to take a full day deposition, appear at my
19 attorneys’ office, answering questions during several interviews by my attorney and his staff
20 either in person or via telephone related to the case, and locating and submitting documents to
21 my attorney in support of the claims.

22 5. Throughout this litigation, I made myself available for a full-day mediation. This
23 mediation ended with a mediator’s proposal. During the mediation, I remained involved and
24 provided information and details about LF’s practices and policies in support of the
25 representative action claims so that the claims could be maximized for the aggrieved employees.
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1 I also made myself available to complete the settlement agreement and finalize the terms of the
2 settlement agreement and execute the settlement agreement.

3 6. In this litigation, I was committed throughout the entire process to ensure that the private
4 attorney general act members were treated fairly. I would estimate that I devoted approximately
5 60 hours to the prosecution and resolution of these claims.
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7 I declare under the penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct. Executed on this ___th day of December 2021 in California.
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10 _____

11 Maria Velez, Declarant
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