

Larry W. Lee (State Bar No. 228175)
 Mai Tulyathan (State Bar No. 316704)
DIVERSITY LAW GROUP, P.C.
 515 S. Figueroa St., Suite 1250
 Los Angeles, CA 90071
 (213) 488-6555
 (213) 488-6554 facsimile

William L. Marder (State Bar No. 170131)
Polaris Law Group LLP
 501 San Benito Street, Suite 200
 Hollister, CA 95023
 (831) 531-4214
 (831) 634-0333 facsimile

Attorneys for Plaintiff, the Class, and Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF KERN**

VALERIA RODRIGUEZ, as an individual
 and on behalf of all others similarly
 situated,

Plaintiff,

vs.

JOHN BEAN TECHNOLOGIES
 CORPORATION, a Delaware corporation;
 and DOES 1 through 50, inclusive,

Defendants.

Case No.: BCV-20-101913-JEB

[Assigned for all purposes to the Hon. J. Eric
 Bradshaw, Dept. J]

**DECLARATION OF VALERIA
 RODRIGUEZ IN SUPPORT OF
 PLAINTIFF'S MOTION FOR FINAL
 APPROVAL OF CLASS ACTION
 SETTLEMENT**

Date: June 6, 2022

Time: 8:30 a.m.

Dept.: J

Complaint Filed: August 17, 2020

FAC Filed: August 18, 2021

Trial Date: None

DECLARATION OF VALERIA RODRIGUEZ

I, Valeria Rodriguez, declare as follows:

1. I am an individual over the age of 18 years old and am a resident of California. I am the named Plaintiff in this matter. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I worked for Defendant John Bean Technologies Corporation (“Defendant”) from October 2018 until about on or about June 10, 2020 as a service technician. During my employment with Defendant, I was a non-exempt employee, and was paid hourly.

3. During my employment with Defendant, I was underpaid overtime and sick pay wages. Specifically, I was regularly paid non-discretionary incentives, such as shift premium wages, that were not factored into the regular rate of pay for overtime wages or sick pay wages.

4. During my employment with Defendant, I was not provided with off-duty meal periods and I was not paid the additional premium compensation for missed meal periods.

5. Furthermore, I was not issued accurate pay stubs whenever I was paid shift premium wages. In this regard, the pay stubs do not provide the hourly rate of pay and hours worked.

6. During the pendency of this lawsuit, I was required to provide assistance to my attorneys, including discussing the case with them on numerous occasions and providing them with documents and information. I have spent a significant amount of time in connection with the assistance/prosecution of the claims in this lawsuit. I estimate that I spent approximately 20 to 22 hours in connection with the assistance/prosecution of the claims in this lawsuit. This includes engaging in numerous telephonic discussions with my counsel regarding the case, searching for and providing various documents relating to my claims, including my pay records, reviewing various files and pleadings in this case, including my PAGA letter, the complaint, the Settlement Agreement, and my declarations. Throughout this case, I have continuously been kept apprised of the status of this case.

7. I understand that this action was brought on behalf of other similarly situated employees, and that I am acting as a representative for the Class. As the Class Representative, I

1 understand that it is my responsibility to act in the best interests of the Class and not my own. I
2 agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of
3 any conflicts that exist between my interests and the interests of the Class that would impair or
4 affect my ability to serve as representative for the Class.

5 8. I have and continue to be willing to assist in the investigation of this matter as well
6 as make myself available for deposition, trial, or any further proceedings in this matter as required
7 to represent the interests of the Class. I also understand my duties and responsibilities to the
8 proposed Class and will carry out those duties as necessary.

9 9. I have discussed the terms of the Settlement Agreement with my attorneys, and
10 based on the information provided, I believe the Settlement to be fair, adequate, and reasonable for
11 myself and for the entire Class.

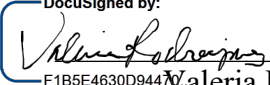
12 10. I understand that I could have been liable for Defendant's legal costs had Defendant
13 prevailed. I also understand that this lawsuit was filed in the public court records, which may
14 affect my ability to obtain future employment.

15 11. In connection with the settlement, I also executed a general release of any and all
16 claims, known and unknown, including a waiver of Civil Code § 1542, which was not required of
17 other Class Members.

18 I declare under penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct.

20 Executed on this ⁹ day of May, 2021, at Shafter, California.

21
22
23
24
25
26
27
28

DocuSigned by:

F1B5E4630D94470 Valeria Rodriguez