

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
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: January 27, 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. I understand that this action was brought on behalf of all other employees in the State of California, and that I am acting as a representative for the Class. As the Class Representative, I understand that it is my responsibility to act in the best interests of the Class and not my own. I agree that I will not put my own interests ahead of that of the Class, and that I will not settle out my class claims in this lawsuit separately or independently from the Class. Moreover, I am not aware of any conflicts that exist between my interests and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

7. I have and continue to be willing to assist in the investigation of this matter, including meeting, conferring, discussing the case with my attorneys, providing any necessary information and documents, making myself available for trial or any further proceedings in this matter as required to represent the interests of the Class. I also understand my duties and responsibilities to the proposed Class and will carry out those duties as necessary.

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

7 10. I also executed a general waiver of any and all claims, including a waiver of
8 California Civil Code § 1542, which I understand was not required of other Class Members.

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

11 Executed on this 17 day of December, 2021, at Shafter, California.

DocuSigned by:
Valeria Rodriguez
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