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10 Attorneys for Plaintiffs,
11 MARIA VELEZ and CLAUDIA TORREZ,
12 and all others similarly situated
13

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF SACRAMENTO**
16 **(UNLIMITED JURISDICTION)**
17

18 MARIA VELEZ and CLAUDIA TORREZ, on
19 behalf of themselves, and all others similarly
20 situated, and as “aggrieved employees” on
21 behalf of other “aggrieved employees” under
22 the Labor Code Private Attorneys General Act
23 of 2004,

24 *Plaintiff(s),*

25 vs.

26 RENAISSANCE FOOD GROUP, LLC, a
27 Delaware limited liability company; GH
28 FOODS CA LLC, a California limited liability
29 company; ~~KENNETH J. CATCHOT, an~~
30 ~~individual;~~ CALAVO GROWERS, INC., a
31 California corporation; ~~G&M HIRE~~
32 ~~ENTERPRISES, LLC doing business as~~
33 ~~ATWORK PERSONNEL SERVICES;~~ and
34 DOES 1 through 50, inclusive,

35 *Defendant(s).*

Case No.: 34-2019-00250841

**DECLARATION OF CLAUDIA TORREZ
IN SUPPORT OF MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

Action filed: February 19, 2019
Hearing Date: August 5, 2022
Hearing Time: 9:00 a.m.
Hearing Dept.: 25, The Honorable Jill H.
Talley



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1 **DECLARATION OF CLAUDIA TORREZ IN SUPPORT OF MOTION FOR**
2 **APPROVAL OF PAGA SETTLEMENT**

3 I, CLAUDIA TORREZ, declares as follows:

4 1. I am a resident of the City of Perris in the State of California and am over 18
5 years of age. I am the named Plaintiff in this action and am represented by David Spivak of The
6 Spivak Law Firm in this action. Except as otherwise stated, I have personal knowledge of all
7 matters set forth in this declaration and could and would competently testify thereto if called
8 upon to do so as a witness.

9 2. My employment with Renaissance Food Group, LLC, GH Foods, CA LLC, and
10 Calavo Growers, Inc. (collectively “Defendants”) began on or about May 5, 2017, and ended on
11 January 2, 2020. I worked for Defendants as a production lead employee.

12 3. I understand that this lawsuit is a Private Attorney General action, otherwise
13 known as a PAGA lawsuit. I understand that I am the Plaintiff and that Renaissance Food Group,
14 LLC, GH Foods, CA LLC, and Calavo Growers, Inc. are the Defendants. I understand that my
15 name is on the cover of the lawsuit. I understand that I am the representative of Defendants’
16 other employees. As the representative in this lawsuit, I have duties to the State of California
17 and other employees like me who didn’t receive all wages for all hours worked, receive timely
18 wages during their employment or at. The termination of their employment, receive accurate
19 employment records, and receive meal periods and on time and rest periods in which we could
20 leave the Defendants’ worksite. I also understand that my lawsuit is on behalf of the State of
21 California. I have fairly represented the other employees and the State throughout this lawsuit.

22 4. My deposition was taken in this action. I understand that the Court will decide
23 whether to approve the Settlement if it is in the best interests of Defendants’ other hourly, non-
24 exempt employees and the State. I don’t have any disagreements with Defendants’ other
25 employees I represent. I am not aware of any reason why I can’t make the best decisions for
26 them in this lawsuit.

27 5. I understand that my attorneys have asked the Court to pay me \$10,000.00 in
28 addition to my share of the Settlement money that the Court will divide among all the employees



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1 whose rights were violated. I believe this amount is fair for the time I have spent and my
2 involvement in this lawsuit. I also believe it is fair because of the risk that the Court could order
3 me to pay Defendants' court costs if I lose the case. Additionally, I believe it is fair because I
4 am giving up rights that the other hourly employees are not giving up to settle this lawsuit.

5 6. As part of this Settlement, I am giving up my right to sue Defendants for
6 anything. I understand that if I had filed a personal lawsuit that did not involve the other
7 employees or the State of California, I probably could have settled the case with Defendants
8 long ago for much more than \$10,000.00 in unpaid wages and monetary penalties. I think it is
9 fair that the Court pay me the \$10,000.00 award for these reasons and others I list below.

10 7. When I agreed to hire my attorneys to file this lawsuit, I also agreed that I would
11 be the representative of the other hourly, non-exempt employees and the State of California. In
12 agreeing to be their representative, I agreed that their interests in the lawsuit are as important as
13 my personal interests in suing the Defendants. I agreed that when deciding whether or not to
14 settle this lawsuit, I would do what is in the best interest of the other hourly, non-exempt
15 employees and the State. I also agreed to actively participate in the lawsuit by answering
16 questions and requests for documents and other evidence by my attorneys and Defendants'
17 attorneys. I understand that this process is known as "discovery." I understand that I also agreed
18 to be interviewed under oath by the attorneys for Defendants. I understand that this process is
19 known as a "deposition." As the representative of the other hourly, non-exempt employees and
20 the State of California, I have agreed to travel to the Court and to the offices of the lawyers for
21 Defendants to testify about the case. I also understand that there will only be a settlement of the
22 lawsuit if the Court allows it. As the representative of the other employees and the State of
23 California, I have agreed to follow the progress of the lawsuit. I have done this since I hired my
24 attorneys by reading the court documents they send me and by speaking with them over the
25 phone. I understand that, even though I agreed to perform these tasks and accept these
26 responsibilities, the Court can choose not to pay me any more money from the Settlement than
27 the other Defendants' employees will receive, even though they have not performed these tasks
28 and accepted these risks and responsibilities. I have spent over 33.39 hours of my time on



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activities related to this lawsuit, including reading the court documents and speaking with my attorneys. Attached as **Exhibit A** to this declaration is a true and correct copy of a list of the work I have done on this case. It includes estimates of the amount of time I spent on each task. The work I have done on this case includes hiring my attorneys, speaking with my attorneys on many occasions by phone, explaining what my employment at Defendants' was like, explaining what my employment at Defendants' worksites had in common with other employees who worked for Defendants, helping my attorneys find witnesses, documents, and other evidence, explaining my claims to my attorneys, attending a full day of mediation, and communicating with my attorneys about the settlement agreement and related documents. I have also carefully reviewed the Settlement Agreement and other documents to make sure that the Settlement and other work my attorneys performed are in the best interests of the employees I represent and the State of California.

8. Because I filed this lawsuit, there is a public record at the Court showing my name on the cover of the complaint for anyone to see. Any potential employer who finds the lawsuit will know I sued a former employer. This could hurt my reputation. This could prevent a potential employer from choosing to hire me. An award of \$10,000.00 is not equal to the harm I would suffer if I can't find another job in the future.

9. Based on the time I have spent on the lawsuit, the risk I will have to pay Defendants court costs if I lose, the harm to my chances of getting jobs in the future, and my agreement to give up any personal claims for unpaid wages and monetary penalties I have against Defendants, my request for an award of \$10,000.00 is fair and reasonable.

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

Executed on 05 / 26 / 2022 in Perris, California.

CLAUDIA TORREZ,
Plaintiff and Declarant



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EXHIBIT A

TIME LOG TORREZ

Client Name	Approximate Date	Activity	Hours
Claudia Torrez	3/31/2020	Calls and/or texts with law firm	0.08
Claudia Torrez	4/2/2020	Calls and/or texts with law firm	0.08
Claudia Torrez	4/16/2020	Calls and/or texts with law firm	0.08
Claudia Torrez	4/22/2020	Calls and/or texts with law firm	0.08
Claudia Torrez	4/23/2020	Calls and/or texts with law firm	2.00
Claudia Torrez	6/18/2020	Reviewing documents: Other docs from law firm	0.25
Claudia Torrez	8/5/2020	Reviewing documents: Retainer/FAQ	2.00
Claudia Torrez	9/21/2020	Reviewing documents: Other docs from law firm	2.00
Claudia Torrez	9/29/2020	Reviewing documents: Other docs from law firm	4.00
Claudia Torrez	9/29/2020	Emails to/from law firm	0.08
Claudia Torrez	9/29/2020	Reviewing documents: Other docs from law firm	0.50
Claudia Torrez	9/29/2020	Deposition: preparation with attorneys	6.50
Claudia Torrez	9/29/2020	Calls and/or texts with law firm	2.00
Claudia Torrez	9/30/2020	Calls and/or texts with law firm	0.25
Claudia Torrez	9/30/2020	Deposition: providing testimony	8.00
Claudia Torrez	10/1/2020	Calls and/or texts with law firm	0.08
Claudia Torrez	10/1/2020	Calls and/or texts with law firm	0.08
Claudia Torrez	5/7/2021	Calls and/or texts with law firm	0.17
Claudia Torrez	12/8/2021	Calls and/or texts with law firm	0.17
Claudia Torrez	1/26/2022	Reviewing documents: Settlement Agreement	0.75
Claudia Torrez	1/28/2022	Calls and/or texts with law firm	0.08
Claudia Torrez	1/28/2022	Calls and/or texts with law firm	0.17
Claudia Torrez	2/1/2022	Calls and/or texts with law firm	0.08
Claudia Torrez	2/1/2022	Calls and/or texts with law firm	0.50
Claudia Torrez	2/3/2022	Reviewing documents: Settlement Agreement	0.33
Claudia Torrez	3/28/2022	Reviewing documents: Complaint	2.00
Claudia Torrez	4/20/2022	Calls and/or texts with law firm	0.08
Claudia Torrez	4/21/2022	Emails to/from law firm	0.08
Claudia Torrez	4/25/2022	Emails to/from law firm	0.17
Claudia Torrez	4/26/2022	Reviewing documents: Other docs from law firm	0.50
Claudia Torrez	4/26/2022	Reviewing documents: Other docs from law firm	0.25
Claudia Torrez	4/29/2022	Calls and/or texts with law firm	0.08
Claudia Torrez	5/10/2022	Emails to/from law firm	0.08
TOTAL HOURS			33.39