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14 Attorneys for Plaintiff,
15 REBECCA PINEDA, as an individual and on behalf of all others similarly situated

16 **SUPERIOR COURT OF CALIFORNIA**

17 **COUNTY OF MONTEREY**

18 REBECCA PINEDA, as an individual and
19 on behalf of all others similarly situated,

20 Plaintiffs,

21 vs.

22 IPPOLITO INTERNATIONAL L.P.; and
23 DOES 1 through 50, inclusive,

24 Defendants.

Case No. 20CV001851

**DECLARATION OF B. JAMES
FITZPATRICK IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: November 16, 2021

Time: 9:00 A.M.

Dept.: 13

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1 is true and correct and if called as a witness I could and would competently testify to each of the
2 matters stated herein, and that I based the matters stated herein upon my personal knowledge
3 based on first-hand observation, except where the matters stated is an opinion or belief, and as to
4 all such opinions and/or beliefs, I do in fact believe them to be true. This declaration was
5 executed on October 22, 2021, in Salinas, California.

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7 /s/ B. James Fitzpatrick

8 B. James Fitzpatrick
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EXHIBIT A

FITZPATRICK & SWANSTON
CLASS/REPRESENTATIVE ACTIONS

1. *Anguiano v. Mann Packing Co., Inc.*, Monterey County Superior Court Case No. 19CV001178
2. *Aquino v. NJ Properties, Inc.*, Monterey County Superior Court Case No. 19CV001522
3. *Arce v. Vintage Senior Management, Inc.*, Monterey County Superior Court Case No. M102563
4. *Areyano v. Tacaza, Inc.*, Fresno County Superior Court Case No. 10CECG03994
5. *Ascencion v. Staples Energy Services, Inc.*, Monterey County Superior Court Case No. 17CV003929
6. *Avila v. Cuevas Tires, Inc.*, Monterey County Superior Court Case No. 19CV001885
7. *Baker v. California Forensic Medical Group, Incorporated*, Monterey County Superior Court Case No. 17CV003723
8. *Ball v. Hersha Hospitality Management, L.P.*, Monterey County Superior Court Case No. 20CV003200
9. *Barbosa v. Kelly Services, Inc.*, Monterey County Superior Court Case No. M133109
10. *Barrios v. Christopher Ranch, LLC*, Santa Clara County Superior Court Case No. 112CV233772
11. *Bautista v. Carmel Valley Manor*, Monterey County Superior Court Case No. M122739
12. *Bautista v. La Princesa Market, Inc. #1*, Monterey County Superior Court Case No. 17CV004445
13. *Bernal v. Davita, Inc.*, USDC, Northern District of California Case No. 5:12-CV-03255-LHK
14. *Bonilla v. James V. Salas, Inc.*, Monterey County Superior Court Case No. 18CV001678
15. *Bueno v. Little Caesars of Santa Cruz, Inc.*, Monterey County Superior Court Case No. M117267
16. *Canseco v. Full Steam Staffing LLC*, Monterey County Superior Court Case Case No. M129251
17. *Castillo v. Elyxir Distributing, LLC*, Santa Cruz County Superior Court Case No. CV177119
18. *Castro v. Emeritus*, Monterey County Superior Court Case No. M118861
19. *Ceja v. Taylor Farms Retail, Inc.*, Monterey County Superior Court Case No. M116475
20. *Chavez v. Oceano Packing Company, LLC*, Monterey County Superior Court Case No. 15CV000018
21. *Chico v. Mi Pueblo*, Monterey County Superior Court Case No. M114983
22. *Clavijo v. Manpower, Inc./California Peninsula*, Monterey County Superior Court Case No. M126646
23. *Cortez v. TR Monterey Management, LLC*, Monterey County Superior Court Case No. 17CV002223
24. *Coyt v. Nelson Staffing, Inc.*, San Benito County Superior Court Case No. CU-14-00130
25. *Cruz v. Gianna's Inc.*, Monterey County Superior Court Case No. M115703
26. *Cruz v. Ocean Queen USA, Inc.* Monterey County Superior Court Case No. 17CV004392

FITZPATRICK & SWANSTON
CLASS/REPRESENTATIVE ACTIONS

27. *De La Torre v. National Security Guard*, Monterey County Superior Court Case No. M122792
28. *Deras v. Merchants Building Maintenance Company*, Monterey County Superior Court Case No. M112362
29. *Echavarria v. A.S.S.E.T. Private Security*, Monterey County Superior Court Case No. 19CV001407
30. *Escalante v. Mi Pueblo San Jose, Inc.*, Santa Cruz County Superior Court Case No. CV170586
31. *Esparza v. Pandori Electronics USA, Inc* Monterey County Superior Court Case No. M117241
32. *Estrada v. Salyer American*, USDC, Northern District of California Case No. 09-CV-05618 LHK
33. *Fernandez v. Driscoll Strawberry Associates, Inc.*, Monterey County Superior Court Case No. M124551
34. *Flores v. Full Steam Staffing LLC*, Monterey County Superior Court Case No. M129277
35. *Flores v. GreenGate Fresh LLLP*, Monterey County Superior Court Case No. M114982
36. *Fuapau v. Lhoist North America of Arizona, Inc.*, USDC, Northern District of California Case No. 20-cv-04404 VKD
37. *Garcia v. Monterey Signature Hotels, LLC*, Monterey County Superior Court Case No. M123573
38. *Goodwin v. Cowles California Media Company*, Monterey County Superior Court Case No. M117831
39. *Guerrero v. Chualar Harvesting, Inc.* Monterey County Superior Court Case No. M129075
40. *Gutierrez v. Fireclay Tile, Inc.*, Santa Cruz County Superior Court Case No. 18CV02840
41. *Gynn v. Magna Legal Services*, Monterey County Superior Court Case No. 19CV001474
42. *Hernandez v. Archon Hospitality*, Monterey County Superior Court Case No. M100610
43. *Hernandez v. Clinica de Salud del Valle de Salinas*, Monterey County Superior Court Case No. M118707
44. *Herrera v. FMG Farm Contractor, Inc.*, Monterey County Superior Court Case No. 19CV000993
45. *Isquierdo v. W.G. Hall, LLC dba @Work Personnel Services, Inc.*, USDC Case No. 5:15-CV-00335 BLF
46. *Jimenez v. Ameri-Kleen*, Monterey County Superior Court Case No. M114430
47. *Jimenez v. Sambrailo Packaging*, Monterey County Superior Court Case No. 20CV003281
48. *Juarez v. Malta Enterprises dba Laurel Inn Motel*, Monterey County Superior Court Case No. M129346
49. *LeFurge v. Tacaza, Inc.* Fresno County Superior Court Case No. 10 CE CG 04433
50. *Lopez v. Motel 6 Operating, L.P.*, Ventura County Superior Court Case No. 56-2020-00542312-CU-OE-VTA
51. *Lopez v. Nutricion Fundamental, Inc.*, Monterey County Superior Court Case No. M112351
52. *Lopez v. Progress Financial*, Monterey County Superior Court Case No. M115703

FITZPATRICK & SWANSTON
CLASS/REPRESENTATIVE ACTIONS

- 53. *Lopez v. Springfield Farms*, Monterey County Superior Court Case No. M122067
- 54. *Macaraig v. Alliance Shippers, Inc.*, Monterey County Superior Court Case No. 20CV001346
- 55. *Macias v. Cypress Healthcare Partners, LLC*, Monterey County Superior Court Case No. 21CV000056
- 56. *Maravilla v. GreenGate Fresh, LLLP*, Monterey County Superior Court, Case No. 21CV001258
- 57. *Marquez v. P&D Food Services, LLC*, Monterey County Superior Court Case No. 18CV001679
- 58. *Martinez v. Harmony Foods Corporation*, Santa Cruz County Superior Court Case No. CV177053
- 59. *Mata v. Manpower, Inc.*, USDC, Northern District of California, Case No. 5:14-CV-03787-LHK
- 60. *Mendez v. Earthbound Farms Holding I, LLC*, San Benito County Superior Court Case No. CU-13-00011
- 61. *Mendoza v. National Vision Inc.*, Monterey County Superior Court Case No. 18CV004327
- 62. *Mendoza v. Planned Parenthood Mar Monte, Inc.*, Santa Clara Superior Court Case No. 18CV329544
- 63. *Michel v. La Princesa Market #14, Inc.*, Santa Cruz County Superior Court Case No. CV175999
- 64. *Montejano v. Fox Factory Inc.*, Santa Cruz County Superior Court Case No. CV175560
- 65. *Montoya v. Full Steam Staffing LLC*, Monterey County Superior Court Case No. 128639
- 66. *Mora v. Robert Mann Packaging, Inc.* Monterey County Superior Court Case No. M125128
- 67. *Mosqueda v. Sansei Gardens, Inc.*, Monterey County Superior Court Case No. 21CV000325
- 68. *Murray v. Granite Wellness Centers*, Nevada County Superior Court Case No. CU20-084680
- 69. *Ochoa v. The Complete Logistics Company*, Santa Clara County Superior Court Case No. 111CV200180
- 70. *Ortiz v. Gurries Property Management, Inc.* Monterey County Superior Court Case No. M121091
- 71. *Ortiz v. Ortega Berry Farms, LLC*, Monterey County Superior Court Case No. 20CV000694
- 72. *Pantoja v. RAMCO Enterprises, L.P.*, Monterey County Superior Court Case No. M126835
- 73. *Pantoja v. National Custom Packing, Inc.*, Monterey County Superior Court Case No. M125340
- 74. *Pineda v. Ippolito International, L.P.* Monterey County Superior Court Case No. 20CV001851
- 75. *Polanco v. Salinas Valley Imaging, LLC*, Monterey County Superior Court Case No. 15CV000800
- 76. *Ponce v. Acosta*, Monterey County Superior Court Case No. 18CV001237
- 77. *Powell v. Walmart, Inc.*, USDC, Southern District of California Case No. 20-CV-02412-BEN-LL
- 78. *Quezada v. Sonora Packing Company, Inc.*, Monterey County Superior Court Case No. M123892

FITZPATRICK & SWANSTON
CLASS/REPRESENTATIVE ACTIONS

79. *Ramirez v. Manpower, Inc.* USDC Case No. C-13-02880 EJD
80. *Ramirez v. Manpower, Inc./California Peninsula*, USDC Case No. C-13-03238 EJD
81. *Reyes v. Randstad US, LLC*, Monterey County Superior Court Case No. 20CV000160
82. *Rico v. Full Steam Staffing LLC*, Monterey County Superior Court Case No. M129278
83. *Rico v. Manpower, Inc./California Peninsula*, Monterey County Superior Court Case No. M129042
84. *Rico v. T.W.D.C. Industries Corp. dba Vision Recycling*, Monterey County Superior Court Case No. M132307
85. *Rivera v. Laser Devices, Inc.*, Monterey County Superior Court Case No. M116176
86. *Robledo v. Randstad US, L.P.*, Monterey County Superior Court Case No. M130588
87. *Robledo v. Randstad US, L.P.*, USDC, Case No. 5:17-CV-01003-BLF
88. *Rodriguez v. Westmont Living, Inc.* Santa Clara County Superior Court Case No. 115CV279290
89. *Romero v. Custom House Hotel, L.P.*, Monterey County Superior Court Case No. M128440
90. *Romero v. Noble House Monterey, LLC*, Monterey County Superior Court Case No. M132275
91. *Rosales v. Santa Fe Mercados, Inc.* Santa Cruz County Superior Court Case No. CV166615
92. *Ruiz v. Monterey Mushrooms, Inc.*, Monterey County Superior Court Case No. 15CV000023
93. *Salgado v. River Ranch Fresh Foods, LLC*, Monterey County Superior Court Case No. M115475
94. *Sanchez v. Keurig Green Mountain, Inc.* Monterey County Superior Court Case No. M132626
95. *Silva v. Foothill Packing, Inc.*, Monterey County Superior Court Case No. M127426
96. *Talavera v. Full Steam Staffing, LLC*, Santa Clara County Superior Court Case No. 114CV267357
97. *Tovar v. Windsor Convalescent and Rehabilitation Center of Salinas*, Monterey County Superior Court Case No. 19CV000354
98. *Trevino v. Acosta, Inc.* USDC, Case No. 5:17-CV-06529-NC
99. *Trevino v. Acosta, Inc.*, Monterey County Superior Court Case No. 17CV004624
100. *Valadez v. Jal Berry Farms, LLC*, Monterey County Superior Court Case No. M127425
101. *Valdez v. Max Hoseit Management Company*, Monterey County Superior Court Case No. M127656
102. *Valdovinos v. KS Industries, L.P.*, Monterey County Superior Court Case No. 19CV003304
103. *Vargas v. Valley Harvest, LLC*, San Benito Superior Court Case No. CU-21-00140
104. *Vargas v. Vasvision Berry Farms, LLC*, Monterey County Superior Court Case No. M126647

FITZPATRICK & SWANSTON
CLASS/REPRESENTATIVE ACTIONS

- 105. *Vega v. Elkhorn Packing, Co., LLC*, Monterey County Superior Court Case No. M121202
- 106. *Weinmann v. Balance Staffing*, Santa Cruz County Superior Court Case No. CV180848
- 107. *Weinmann v. Infinity Staffing*, San Benito County Superior Court Case No. CU-15-00007