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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF TULARE

RODOLFO TELLEZ, as an individual and on
behalf of all others similarly situated, and as a
private attorney general,

Plaintiff,

vs.

SUN VALLEY RAISINS, INC., a California
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. VCU284414

[Assigned to Hon. Nathan Ide]

**DECLARATION OF RODOLFO TELLEZ IN
SUPPORT OF PLAINTIFF’S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: March 13, 2023
Time: 8:30 a.m.
Department: 2

Complaint Filed: September 23, 2020

1 I, Rodolfo Tellez, declare as follows:

2 1. I am an individual over the age of 18. I am the named plaintiff in the above-reference
3 action. I have personal knowledge of the facts set forth below, except as to those matters stated on
4 information and belief and, as to those matters, I believe them to be true. If called as a witness, I could
5 testify competently as to the matters stated in this declaration.

6 2. From around 2018 to 2020, I worked for Sun Valley Raisins, Inc. as a non-exempt
7 employee until around December of 2020. During my employment, I was provided wage statements that
8 showed "SVR – Sanitation," without any address. I am informed and believe that the wage statements
9 failed to list the name and address of the legal entity that is the employer.

10 3. During the pendency of this lawsuit, I have done my best to represent the interests of the
11 employees that are part of the class. I have actively contributed to the litigation of this case. My
12 contributions include but are not limited to (i) participating in numerous telephonic meetings with my
13 attorneys and their staff to discuss the case and review documents prepared on my behalf, (ii) providing
14 my attorneys with information and documents regarding my employment with Defendant, (iii) searching
15 for additional information and documents requested by my attorneys, (iv) reviewing and approving the
16 written notice to the Labor and Workforce Development Agency and the complaint and other papers
17 filed with the court, (v) participating in settlement discussions, (vi) reviewing and executing the
18 settlement agreement, and (vii) reviewing and signing the declarations submitted to this Court in support
19 of the settlement.

20 4. I understand that the class claims alleged in this action were brought on behalf of other
21 similarly situated employees, and thus I am acting as a representative for the Class. I understood that an
22 individual case would have resolved much faster than a class action and involved much less financial
23 risk than a class action.

24 5. Throughout the lawsuit, I have been kept apprised of the status of this case. As the class
25 representative, I understand that it is my responsibility to act in the Class's best interest and not my own.
26 I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of any
27 conflicts that exist between my interest and the interests of the Class that would impair or affect my
28 ability to serve as representative for the Class.

8. I understood that filing this lawsuit is a public record and I accepted that burden. This lawsuit is something that potential employers can look into, and which may cause a negative impact of my employment prospects. I also understood that there were risks due to my involvement as a named plaintiff in a representative lawsuit against a large employer. For instance, if I lost, I might have to face a judgment for some of Defendant's legal costs. Even understanding all these risks, I was willing to move forward and bring this case on behalf of the other employees.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 9th day of February 2023, at Visalia, California.

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DECLARATION OF RODOLFO TELLEZ IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT