

LEX OPUS
MOHAMMED K. GHODS (SBN 144616)
mghods@lexopusfirm.com
JEREMY A. RHYNE (SBN 217378)
jrhyne@lexopusfirm.com
2100 N. Broadway, Ste. 210
Santa Ana, CA 92706
T: (714) 558-8580
F: (714) 558-8579

Attorney for EDGAR CISNEROS, PATRICK CROWLEY, and
STANTON WOOD as Private Attorneys General

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA
COOK DIVISION

LILIA GARCÍA-BROWER, in her official
capacity as Labor Commissioner for the State
of California,

Plaintiff,

v.

ALCO HARVESTING LLC d/b/a
BONIPAK PRODUCE, INC.;
BETTERAVIA FARMS LLC d/b/a
BONIPAK PRODUCE, INC.;
BETTERAVIA INVESTMENT LLC d/b/a
BONIPAK PRODUCE, INC.;
GRUBSTAKE INVESTMENTS LLC d/b/a
BONIPAK PRODUCE, INC.; BONITA
PACKING CO. d/b/a BONIPAK
PRODUCE, INC.; and DOES 1-20,
inclusive,

Defendants.

Case No. 21CV02855
Consolidated with 21CV00299 and 21CV04639
Related Cases: 22CV02506, 23CV03669

**DECLARATION OF JEREMY A. RHYNE
IN SUPPORT OF MOTION FOR
APPROVAL OF SETTLEMENT**

Date: XXXXXXXX
Time: 8:30 a.m.
Dept: 1/ Hon. Patricia L. Kelly

Complaint filed: 7/16/2021
Trial Date: None set

(No fee per Labor Code §§ 101, 101.5 and
Government Code § 6103)

JESUS GUZMAN,

Plaintiff,

Santa Barbara Sup. Ct. Case No. 21CV00299

Action filed: January 22, 2021

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

v. ALCO HARVESTING, LLC, BETTERAVIA FARMS, LLC, BONIPAK PRODUCE, INC.; and DOES 1-20, Inclusive, Defendants.	Trial date: none set
STATE OF CALIFORNIA ex rel. EDGAR CISNEROS, as Private Attorney General, Plaintiff(s), v. ALCO HARVEST, INC., a corporation; RANCHO HARVEST, INC., a corporation; JESUS MANRIQUEZ, an individual; ALAIN PINCOT, an individual; ROBERT M. FERINI, an individual; MITCHELL D. ARDANTZ, an individual; CRAIG A. READ, an individual; and JEREMY M. MACKENZIE, an individual; and DOES 1-25, inclusive, Defendants.	San Luis Obispo Sup. Ct. Case No. 21CV04639 Action filed: February 13, 2020 Trial date: none set

DECLARATION OF JEREMY RHYNE

I, JEREMY A. RHYNE, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and Senior Of Counsel at Lex Opus, attorneys of record for Plaintiffs in this matter. I have personal knowledge of the matters set forth herein and would and could testify thereto if called as a witness herein.

2. I graduated from Hastings College of the Law, (J.D. 2001), graduating in the top one third of my class, and attended Biola University (B.A., Philosophy 1997, Magna Cum Laude).

3. I was admitted to practice law in California in 2001, and am admitted to practice before all U.S. district courts in California as well as the Ninth Circuit Court of Appeals. I have been practicing civil litigation continuously for 24 years.

4. My practice areas include Employment including wage/hour litigation, Business, Construction, Credit Reporting, Real Estate, Landlord-Tenant, and Commercial and Residential Leasing Disputes.

5. I started my practice with the law firm of Crowell & Moring LLP in Irvine, California. For four years, I specialized in business litigation with a specific emphasis in construction and credit reporting litigation. In 2005, I joined the law firm of Ross, Dixon & Bell LLP, which later merged with Troutman Sanders LLP. (Troutman Sanders is now known as Troutman Pepper). From 2005 to 2011 at Ross, Dixon, & Bell and at Troutman Sanders, I continued to practice business litigation, which exposed me to a wide variety of cases and practice areas including international telecommunications disputes, employment disputes including wage and hour and discrimination claims, partnership disputes, wrongful foreclosure, healthcare disputes, malpractice claims, civil RICO cases, and real estate disputes, among other types of cases. I was named as one of the Top Young Lawyers in California in two consecutive years by Super Lawyers Magazine, Rising Stars.

6. From 2011 to the present, I have been working at Lex Opus, continuing my general business litigation practice. Over the last several years, my practice has continued to grow in scope and variety and I have successfully litigated numerous cases involving disputes among business partners, disputes between developers and city personnel, disputes between individuals and their

1 banks, insurers, or landlords, and defended numerous employment matters for the firm's business
2 clients. While my practice can generally be characterized as general business litigation, I represent
3 both individuals and businesses who are confronted with legal challenges of a wide variety,
4 including class actions. However, for the last several years, a large portion of my practice has been
5 devoted to employment matters.

6 7. Mr. Escobedo and I have extensive experience in prosecuting and defending against
7 employment law cases together, especially wage and hour class/representative actions. In addition
8 to this case, we are also Plaintiff's counsel in several other putative wage-and-hour class actions and
9 PAGA matters.

10 8. We have also represented employers in numerous class action and representative
11 lawsuits. We have obtained favorable class action settlements for both employees and employers,
12 and have worked with employees' counsel to resolve highly contentious cases. Through our work
13 prosecuting and defending wage-and-hour class actions in state and federal courts for our various
14 clients, I have become well versed in California law governing employees' wages, as well as
15 procedures governing representative actions. Our balanced experience is helpful in evaluating and
16 prosecuting claims such as the ones at issue here.

17 9. Based on my experience in this area, it is my opinion that the settlement in this action,
18 which was aggressively litigated by both sides for nearly five years, is fair, reasonable, and adequate
19 to protect the class and PAGA cohort. I therefore concur with the arguments presented in the
20 accompanying motion for preliminary approval of the settlement.

21 10. My firm, Lex Opus, incurred costs in this matter since the case inception. I instructed
22 staff at my office to total up the costs incurred, and prepare a spreadsheet concerning the same.
23 Attached hereto as **Exhibit A** is a true and correct copy of the spreadsheet of incurred costs, which
24 shows my firm has incurred \$12,088 in costs.

25 I declare under penalty of perjury under the laws of the State of California that the foregoing
26 is true and correct. Executed this 14th day of October, 2025.

27
28 By: _____

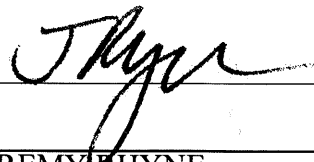


EXHIBIT A

79-0110 Cisneros v. ALCO Harvesting

Date	Account	Source Name	Memo	Amount
9/30/2019	Printing and Reproduction	Copy Charges		\$1.20
9/30/2019	Postage and Delivery	Postage		\$13.60
12/6/2019	Filing Fees	LWDA	PAGA Claim	\$75.00
12/31/2019	Printing and Reproduction	Copy Charges		\$10.00
12/31/2019	Postage and Delivery	Postage		\$49.15
2/13/2020	Attorney Services	One Legal	Filing of Complaint, CCCS, Summons	\$463.06
2/29/2020	Printing and Reproduction	Copy Charges	Feb	\$13.40
2/29/2020	Postage and Delivery	Postage	Feb	\$1.60
3/12/2020	Attorney Services	One Legal	Notice of Acknowledgment & Receipt	\$13.55
3/30/2020	Attorney Services	One Legal	Filing change of address	\$13.55
3/31/2020	Printing and Reproduction	Copy Charges		\$2.20
3/31/2020	Postage and Delivery	Postage		\$0.50
7/31/2020	Printing and Reproduction	LO	jul copies	\$1.60
8/7/2020	Attorney Services	One Legal	efile CMS	\$13.55
8/31/2020	Printing and Reproduction	LO	aug copies	\$2.80
1/31/2021	Printing and Reproduction	LO	jan copies	\$34.50
1/31/2021	Postage and Delivery	LO	jan postage	\$2.60
3/17/2021	Attorney Services	One Legal	efile Motion to Amend, Dec Prop Order	\$77.52
3/31/2021	Printing and Reproduction	LO	Mar copies	\$1.20
4/30/2021	Printing and Reproduction	LO	Apr. copies	\$3.00
8/12/2021	Attorney Services	One Legal	efile Amended complaint	\$16.06
8/31/2021	Printing and Reproduction	LO	aug copies	\$11.60
8/31/2021	Postage and Delivery	LO	aug postage	\$1.82
10/18/2021	Mediation Fee	Bongiovi Mediation	10/18 mediation	\$2,125.00
12/31/2021	Printing and Reproduction	LO	dec copies	\$5.80
2/28/2022	Printing and Reproduction	LO	Feb copies	\$1.40
2/23/2022	Depositions and Transcripts	Litigation Services	Edgar Cisneros	\$921.30
2/24/2022	Attorney Services	One Legal	Notice of Change of Address	\$17.66
6/10/2022	Mediation Fee	Judicate West	Hon. Leo Papas 9/9/22 Hearing	\$3,850.00

7/31/2022	Postage and Delivery	LO	July postage	\$0.57
10/10/2022	Attorney Services	One Legal	Request for Partial Dismissal	\$18.17
10/27/2022	Attorney Services	One Legal	Opposition	\$18.17
10/27/2022	Postage and Delivery	GLS	Delivery to Charley Stoll	\$11.26
10/27/2022	Postage and Delivery	GLS	Delivery to The Saqui Law Group, P.C.	\$12.81
10/31/2022	Postage and Delivery	GLS	Delivery to LO	\$12.75
10/31/2022	Postage and Delivery	LO	Oct postage	\$1.13
10/31/2022	Printing and Reproduction	LO	Oct copies	\$21.40
8/3/2023	Mediation Fee	Judicate west	refund for unused retainer	-\$600.00
8/24/2023	Attorney Services	ASAP Legal	Opposition	\$15.10
10/12/2023	Attorney Services	ASAP Legal	Association of attorney counsel	\$15.10
10/23/2024	Attorney Services	One Legal	Statement, Proposed Order	\$20.86
3/5/2025	Mediation Fee	ADR Services	Tele Conference	\$275.00
1/28/2025	Mediation Fee	ADR Services	Hon. James Lambden 2/18/25 Hearing	\$3,557.50
2/17/2025	Travel, Parking, Mileage	JAR	Flight, hotel, and parking 2/17-2/19	\$963.96
			Total:	\$12,088.00