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STATE OF CALIFORNIA

SUPERIOR COURT FOR THE COUNTY OF FRESNO

RAMON HUERTA, an individual and on
behalf of all others similarly situated and
aggrieved,

Plaintiffs,

v.

BATTH FARMS, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 21CECG01833

**DECLARATION OF KANWAR BATTH
IN SUPPORT OF CLASS AND PAGA
SETTLEMENT**

Complaint Filed: June 24, 2021
Trial Date: May 18, 2026

I, Kanwar Batth, declare:

1. I have personal knowledge as to all matters stated herein, except those matters stated on information and belief, and as to those matters, I believe they are true. If called to testify as a witness, I could and would competently testify to these matters under oath.

2. I am the co-owner of Defendant Batth Farms, Inc. ("Defendant" or "the Company"), in the above-captioned matter. As part of my duties, I oversee the administration of the Company's payroll. I have access to the Company's records relating to payroll and human resources including, but not limited to, paystubs, time records, and dates of employment.

3. On October 6, 2025, the Parties participated in a full day mediation with Monique Ngo-Bonnici, Esq.

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1 4. It is Defendant's position that the Class action and PAGA settlement is fair and
2 reasonable for all Parties involved. From June 24, 2017 through October 6, 2025, the Company
3 estimated that there were: (1) 569 putative class members; and (2) 50,269 workweeks at issue. To
4 generate these numbers, I compiled a list of the Company's non-exempt California employees, with
5 each employee's hire date and termination date, if any, and any additional dates associated with
6 rehire, if applicable. Given the complexities of this case, the defenses, along with the uncertainties
7 of trial, the proposed settlement is fair, reasonable, adequate, and should be approved.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing
9 is true and correct and that this Declaration was executed on the Eighteenth day of September 2026,
10 at Caruthers, California.



kanwar batth (Sep 18, 2026 12:59:32 PDT)

Kanwar Batth

PROOF OF SERVICE
(CODE CIV. PROC. § 1013A(3))

STATE OF CALIFORNIA, COUNTY OF FRESNO

I am employed in the County of Fresno, State of California. I am over the age of 18 years and am not a party to the within action; my business address is 5260 North Palm Avenue, Suite 400, Fresno, California 93704.

On September 18, 2025, I served the following document(s) described as **DECLARATION OF KANWAR BATTH IN SUPPORT OF CLASS AND PAGA SETTLEMENT** on the interested parties in this action by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

SEE ATTACHED SERVICE LIST

- ☐ **BY MAIL:** I deposited such envelope in the mail at Fresno, California. The envelope(s) was mailed with postage thereon fully prepaid. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.
- ☐ **BY OVERNIGHT COURIER:** I sent such document(s) on September 18, 2026, by with postage thereon fully prepaid at Fresno, California.
- ☐ **BY FAX:** I sent such document by use of facsimile machine telephone number (559) 473-1483. Facsimile cover sheet and confirmation is attached hereto indicating the recipients' facsimile number and time of transmission pursuant to California Rules of Court Rule 2.306. The facsimile machine I used complied with California Rules of Court Rule 2.301(3) and no error was reported by the machine.
- ☐ **BY PERSONAL SERVICE:** I placed the above document in a sealed envelope. I caused said envelope to be handed to our messenger service to be delivered by hand to the above address(es).
- ☒ **BY EMAIL:** I sent such document by use of email to the email address(es) above. (CCP § 1013(a)) Such document was scanned and emailed to such recipient and email confirmation is attached hereto indicating the recipients' email address and time of receipt pursuant to CCP § 1013(g).

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

Executed on September 18, 2025, at Fresno, California.

Mehgan Ferreira Kisling

SERVICE LIST

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Decl of K. Batth ISO Class and PAGA Settlement

Final Audit Report

2026-09-18

Created:	2026-09-18
By:	Mehgan Ferreira (mehgan@sw2law.com)
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"Decl of K. Batth ISO Class and PAGA Settlement" History



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Agreement completed.

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