

1 Sage S. Stone (State Bar No. 304086)
sstone@blackstonepc.com
2 Zachary T. Gershman (State Bar No. 328004)
zgershman@blackstonepc.com
3 Alexandra Rose (State Bar No. 329407)
arose@blackstonepc.com
4 Jasmine Y. Kianfard (State Bar No. 349975)
jkianfard@blackstonepc.com
5 **BLACKSTONE LAW, APC**
6 8383 Wilshire Boulevard, Suite 745
7 Beverly Hills, California 90211
8 Telephone: (310) 622-4278
Fax: (855) 786-6356

9 Attorneys for Plaintiffs, RAMON HUERTA,
ANTONIO DIAZ, FELICIANO BERNABE
10 BARRIOS, and NORBERTO HUERTA-MARTINEZ on behalf of
11 themselves and all others similarly situated and aggrieved

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **FOR THE COUNTY OF FRESNO**

14 RAMON HUERTA, an individual; ANTONIO
DIAZ, an individual; FELICIANO BERNABE
15 BARRIOS, an individual; JUAN CARLOS
MORENO LOPEZ, an individual; NORBERTO
16 HUERTA-MARTINEZ, an individual; on behalf
of themselves and all others similarly situated and
17 aggrieved,

18 Plaintiffs,

19 vs.

20 BATHH FARMS, INC., a California
21 corporation; and DOES 1 through 100, inclusive,

22
23 Defendants.
24
25
26
27
28

Case No. 21CECG01833

Honorable Steven M. Crass
Department 403

PROOF OF SERVICE

Complaint Filed: June 24, 2021
FAC Filed: March 14, 2023
Trial Date: Not Set

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF FRESNO

I, Karina Hernandez, certify and declare as follows:

I am over eighteen years of age and not a party to the within action; my business address is 8383 Wilshire Blvd, Suite 745, Beverly Hills, California 90211. On September 18, 2026, I served a copy of the following document(s):

- **NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF**
- **DECLARATION OF JASMINE Y. KIANFARD IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**
- **DECLARATION OF DAVID D. BIBIYAN IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS AND REPRESENTATIVE ACTION SETTLEMENT AND PROVISIONAL CLASS CERTIFICATION FOR SETTLEMENT PURPOSES ONLY**
- **DECLARATION OF PLAINTIFF RAMON HUERTA IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**
- **DECLARATION OF PLAINTIFF FELICIANO BERNABE BARRIOS IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**
- **DECLARATION OF PLAINTIFF ANTONIO DIAZ IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**
- **DECLARATION OF PLAINTIFF NORBERTO HUERTA-MARTINEZ IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**
- **DECLARATION OF KANWAR BATTH IN SUPPORT OF CLASS AND PAGA SETTLEMENT**
- **DECLARATION OF LISA MULLINS OF ILYM GROUP, INC., THE PROPOSED SETTLEMENT ADMINISTRATOR**
- **DECLARATION OF SEAN CHASWORTH IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**
- **[PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**

On the interested parties as follows:

David D. Bibiyan
david@tomorrowlaw.com
Rafael Yedoyan
rafael@tomorrowlaw.com
Vedang J. Patel

Attorneys for Plaintiffs Ramon Huerta,
Antonia Diaz, Feliciano Bernabe Barrios, and
Norberto Huerta-Martinez

vedang@tomorrowlaw.com
BIBIYAN LAW GROUP, P.C.
1460 Westwood Boulevard
Los Angeles, California 90024
Tel: (310) 438-5555 / Fax: (310) 300-1705

Howard A. Sagaser
Nick Solaegui
SAGASER, WATKINS & WIELAND PC
5260 North Palm Avenue, Suite 400
Fresno, CA 93704
Emails: has@sw2law.com
nsolaegui@sw2law.com
mehgan@sw2law.com
Dayana@sw2law.com
faye@sw2law.com

Attorneys for Defendant
BATTH FARMS, INC.

☒ **BY ELECTRONIC MAIL (E-MAIL):** I caused said document(s) to be delivered electronically to be delivered to the above referenced addressee(s) via email from email address khernandez@blackstonepc.com pursuant to California Code of Civil Procedure section 1010.6(e)(1). I did not receive any electronic message or other indication that the transmission was unsuccessful.

State of California, Labor & Workforce Development Agency
Web URL:

<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

☒ **BY ONLINE SUBMISSION:** The above-referenced documents were transmitted to the California Labor and Workforce Development Agency through the online system established for the submission of notices and documents, in conformity with California Labor Code section 2699(I). I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☒ **STATE:** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 18, 2026 at Beverly Hills, California.

/s/ Karina Hernandez
Karina Hernandez