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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

RICARDO RODRIGUEZ-ALVAREZ, as
an individual and on behalf of all others
similarly situated,

Plaintiff,

vs.

NORTHWEST CONFECTIONS
CALIFORNIA, LLC, a California limited
liability company; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 34-2021-00300622-CU-OE-GDS

**DECLARATION OF RICARDO RODRIGUEZ-
ALVAREZ IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: April 21, 2023

Time: 9:00 a.m.

Dept.: 27

Complaint Filed: May 12, 2021

FAC Filed: June 11, 2021

Trial Date: None

1 **DECLARATION OF RICARDO RODRIGUEZ-ALVAREZ**

2 I, Ricardo Rodriguez-Alvarez, declare as follows:

3 1. I am an individual over the age of 18 years old and am a resident of California. I
4 am the named Plaintiff in this matter. I have personal knowledge of the facts set forth below and
5 if called to testify I could and would do so competently.

6 2. I worked for Defendant Northwest Confections California, LLC (“Defendant”) as
7 a packager in Defendant’s warehouse, from about November 29, 2020, until on or about April
8 13, 2021. During my employment with Defendant, I was a non-exempt, hourly employee.

9 3. During my employment with Defendant, I was required to undergo daily COVID-
10 19 screening procedures before entering the work premises and starting my shift. The screening
11 procedures included a temperature check and answering a COVID-19 health questionnaire. I was
12 not paid minimum, regular, or overtime wages for the time spent undergoing the screening.

13 4. Since I did not receive all wages owed during each pay period, the corresponding
14 wage statements I received displayed inaccurate gross and net wages earned, number of
15 minimum and/or overtime hours worked, and total hours worked.

16 5. I did not receive all wages owed to me upon separation of employment. In
17 addition to the wages owed to the COVID-19 screening procedures, Defendant did not pay me
18 all accrued vacation wages upon separation of employment.

19 6. During the pendency of this lawsuit, I was required to provide assistance to my
20 attorneys, including meeting with them and providing them with documents and information. I
21 have continuously been kept apprised of the status of this case. I estimate I have spent
22 approximately 20-25 hours in assisting to litigate this case from the inception until now.
23 Specifically, I have discussed the allegations in the lawsuit, relevant documents, and policies
24 with my attorneys. I have also reviewed and approved the settlement documents and other
25 pleadings in this case.

26 7. I understand that the class claims alleged in this action were brought on behalf of
27 other similarly situated employees, and thus I am acting as a representative for the Class. As the
28 class representative, I understand that it is my responsibility to act in the Class’s best interest and

1 not my own. I agree that I will not put my own interests ahead of that of the Class. Moreover, I
2 am not aware of any conflicts that exist between my interest and the interests of the Class that
3 would impair or affect my ability to serve as representative for the Class.

4 8. I have and continue to be willing to assist in the investigation of this matter as
5 well as make myself available for trial or any further proceeding in this matter as required to
6 represent the interests of the Class. I also understand my duties and responsibilities to the
7 proposed class and will carry out those duties as necessary.

8 9. Based on my understanding of the case, I am of the opinion that settlement for the
9 consideration and on the terms set forth in the Settlement Agreement are fair, reasonable, and
10 adequate and is in the best interests of the Class.

11 10. I am aware and have been aware from the inception of the case, that there is the
12 risk that if I do not win my case, then I could be liable for Defendant's litigation costs. I accepted
13 that risk in this case. I also understood that an individual case would have resolved much faster
14 than a class action and involved much less financial risk than a class action.

15 11. I understood that filing this lawsuit is a public record, and I accepted that burden.
16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct.

18 Executed on this 28 day of March 2023, at Sacramento, California.

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21 Ricardo Rodriguez-Alvarez
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