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Attorneys for Plaintiffs, on behalf of themselves
and all others similarly situated and aggrieved

[Additional Counsel on Next Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF KINGS

ADALBERTO PEREZ, JOSEPH MITCHELL,
JULIO A. VASQUEZ, ALFREDO RIVERA,
an individual and on behalf of all others
similarly situated,

Plaintiffs

v.

HOLLANDIA FARMS, INC., a California
corporation; HOLLANDIA FARMS NORTH,
INC., a California corporation; HOLLANDIA
DAIRY, INC., a California corporation; and
DOES 1 through 100, inclusive,

Defendants.

CASE NO.: 22C-0302

[Assigned to the Hon. Robert S. Burns in Dept.
2]

**DECLARATION OF JASMIN K. GILL IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND REPRESENTATIVE
ACTION SETTLEMENT AND
CERTIFYING CLASS FOR
SETTLEMENT PURPOSES ONLY**

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1 am informed and believe that I have the experience, resources, and means necessary to allow us to
2 provide adequate representation as Class Counsel to all class members in this litigation.

3 9. I have been appointed Class Counsel by the Superior Court of California in the past
4 for purposes of certifying a class. Class Counsel has also settled matters on a “PAGA Only” basis
5 for aggrieved employees in the past. Some examples of Actions in which I was appointed Class
6 Counsel and/or settled on a “PAGA only” basis include:

7 a. *Ramirez v. Acre Gourmet, Inc.*, Case No. CGC-19-575117, California
8 Superior Court, County of San Francisco;

9 b. *Smith v. McMillen Enterprises, Inc.*, Case No. CV-20-002938, California
10 Superior Court, County of Stanislaus;

11 c. *Conness v. The Carlson Company, et al.*, Case No. 37-2021-00015907-CU-
12 OE-CTL, California Superior Court, County of San Diego;

13 d. *Nunez v. Hale & Sons Plumbing, Inc., et al.*, Case No. 37-2021-00036208-
14 CU-OE-CTL, California Superior Court, County of San Diego;

15 e. *Dethrasavong v. ASI Computer Technologies, Inc.*, Case No. 20STCV32312,
16 California Superior Court, County of Los Angeles;

17 f. *Moreno v. Santa Paula Post Acute, LLC, et al.*, Case No. 21STCV12533,
18 California Superior Court, County of Los Angeles;

19 g. *Toste v. PATH Ventures*, Case No. 19STCV45845, California Superior
20 Court, County of Los Angeles;

21 h. *Lodge v. California Food Management, LLC, et al.*, Case No. 19STCV32348,
22 California Superior Court, County of Los Angeles;

23 i. *Ramirez v. SeaWin, Inc., et al.*, Case No. 21STCV22026, California Superior
24 Court, County of Los Angeles;

25 j. *Jeong v. GameVil Com2US USA, Inc., et al.*, Case No. 22STCV11790,
26 California Superior Court, County of Los Angeles;

27 k. *Aguilar v. Bioness Inc., et al.*, Case No. 21STCV41702, California Superior
28 Court, County of Los Angeles;

1 l. *Zarate v. Clark and White Landscape*, Case No. 23SMCV01977, California
2 Superior Court, County of Los Angeles;

3 m. *Stone v. Zohar Construction, Inc.*, Case No. 23STCV07071, California
4 Superior Court, County of Los Angeles;

5 n. *Weber v. Professional Security Consultants, et al.*, Case No. 21STCV26101,
6 California Superior Court, County of Los Angeles;

7 o. *Lopez v. Wilhelm Electric Co., Inc., et al.*, Case No. 30-2020-01156888-CU-
8 OE-CXC, California Superior Court, County of Orange, which is a class and representative PAGA
9 action matter in which I successfully opposed a Motion for Summary Adjudication brought by
10 Defendants after the class was certified;

11 p. *Heredia v. Alan Smith Pool Plastering, Inc., et al.*, Case No. 30-2020-
12 01163609-CU-OE-CXC, California Superior Court, County of Orange;

13 q. *Perez v. D&G Restaurants, LLC*, Case No. 30-2021-01209638-CU-OE-
14 CXC, California Superior Court, County of Orange;

15 r. *Ledesma v. Connell Chevrolet, et al.*, Case No. 30-2021-01210019-CU-OE-
16 CXC, California Superior Court, County of Orange;

17 s. *Ojeda v. Mashburn Transportation, Inc., Goodman v. Mashburn*
18 *Transportation, Inc., et al., and Ruiz v. Mashburn Transportation Services, Inc.*, Case Nos. BCV-
19 20-100972-JEB, BCV-21-101196-BCB, and BCV-22-100698-BCB, California Superior Court,
20 County of Kern;

21 t. *Torres, et al. v. Johnston Nurseries, FLP, et al.*, Case No. BCV-19-100830-
22 TSC, California Superior Court, County of Kern;

23 u. *Almorisi v. M.A. Mortenson Company, et al.*, Case Nos. BCV-23-100727 and
24 BCV-23-101522, California Superior Court, County of Kern;

25 v. *Pacheco, et al. v. JCC Logistics, Inc., et al.*, Case No. BCV-21-102266,
26 California Superior Court, County of Kern; and

27 w. *Reyes v 9to5 Seating LLC*, Case No. 23STCV17221, California Superior
28 Court, County of Los Angeles.

10. Most recently, I served as lead counsel and first-chaired a bench trial for PAGA claims brought by my office on behalf of a group of aggrieved employees in a wage-and-hour class and representative PAGA action matter that has been pending for several years. I also recently served as lead counsel and first-chaired a jury trial for a sexual harassment case in which the jury found in favor of plaintiff on all claims and awarded approximately \$10.7 million in damages.

11. I believe that I am sufficiently experienced and qualified to evaluate the Class Members' claims and the viability of Defendant's defenses.

12. Should the Court refuse to grant preliminary approval of this Settlement, many of the Class Members may be denied any recourse for Defendant's alleged violations.

13. For these reasons, as well as the reasons provided in the Class Counsel Declarations filed in support of Plaintiffs' Motion, I believe that Class Counsel are sufficiently experienced and qualified to evaluate the Class Members' claims and viability of Defendant's defenses in the Action.

14. I believe, and as further set out in the Class Counsel Declarations filed in support of Plaintiffs' Motion, the settlement presented here only resulted after having engaged in extensive informal discovery and investigation and is the product of hard-fought litigation and extensive arm's-length negotiations.

15. I believe, based on my experience as class counsel, that the settlement is fair, reasonable, adequate and in the best interests of class members.

16. After diligent inquiry, neither I nor any member of my law firm has any interest in or conflict with either of the *cy pres* recipients, Visalia Rescue Mission or San Diego Rescue Mission.

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

Executed on February 11, 2026 at Los Angeles, California.

/s/ Jasmin K. Gill

Jasmin K. Gill