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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 ASHLIE E. FOX 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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all others similarly situated and aggrieved

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1 District Court for the Central District of California, which resulted in a published opinion upholding
2 certification, *Abdullah v. U.S. Sec. Associates, Inc.*, 731 F.3d 952, 957 (2013), as well as notable
3 certified cases against Abercrombie & Fitch Stores, Inc. and Wal-Mart Stores, Inc.

4 8. During the seven years that I worked for the Law Offices of Peter M. Hart, I worked
5 on dozens of wage and hour class actions and representative PAGA actions. While I was employed,
6 the firm was appointed class counsel and/or Plaintiff's counsel in numerous class action and/or
7 PAGA cases, wherein my hourly rate was approved by the courts.

8 9. In 2025, I joined J. Gill Law Group, P.C. as a senior associate attorney. J. Gill Law
9 Group, P.C. concentrates in representation of employees, on an individual, class, and representative
10 basis, against employers to recover unpaid wages, most often in class and representative actions,
11 and to vindicate harassment, discrimination and retaliation in various contexts, I am informed and
12 believe that the firm's principal, Jasmin K. Gill, has been appointed named Class Counsel and/or
13 Plaintiff's Counsel by the Superior Court of California in several class action and/or PAGA cases,
14 which include:

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

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

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

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

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

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

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

- 1 h. *Lodge v. California Food Management, LLC, et al.*, Case No. 19STCV32348,
2 California Superior Court, County of Los Angeles;
- 3 i. *Ramirez v. SeaWin, Inc., et al.*, Case No. 21STCV22026, California Superior
4 Court, County of Los Angeles;
- 5 j. *Jeong v. GameVil Com2US USA, Inc., et al.*, Case No. 22STCV11790,
6 California Superior Court, County of Los Angeles;
- 7 k. *Aguilar v. Bioness Inc., et al.*, Case No. 21STCV41702, California Superior
8 Court, County of Los Angeles;
- 9 l. *Zarate v. Clark and White Landscape*, Case No. 23SMCV01977, California
10 Superior Court, County of Los Angeles;
- 11 m. *Stone v. Zohar Construction, Inc.*, Case No. 23STCV07071, California
12 Superior Court, County of Los Angeles;
- 13 n. *Weber v. Professional Security Consultants, et al.*, Case No. 21STCV26101,
14 California Superior Court, County of Los Angeles;
- 15 o. *Lopez v. Wilhelm Electric Co., Inc., et al.*, Case No. 30-2020-01156888-CU-
16 OE-CXC, California Superior Court, County of Orange, which is a class and representative PAGA
17 action matter in which the firm successfully opposed a Motion for Summary Adjudication brought
18 by Defendants after the class was certified;
- 19 p. *Heredia v. Alan Smith Pool Plastering, Inc., et al.*, Case No. 30-2020-
20 01163609-CU-OE-CXC, California Superior Court, County of Orange;
- 21 q. *Perez v. D&G Restaurants, LLC*, Case No. 30-2021-01209638-CU-OE-
22 CXC, California Superior Court, County of Orange;
- 23 r. *Ledesma v. Connell Chevrolet, et al.*, Case No. 30-2021-01210019-CU-OE-
24 CXC, California Superior Court, County of Orange;
- 25 s. *Ojeda v. Mashburn Transportation, Inc., Goodman v. Mashburn*
26 *Transportation, Inc., et al.*, and *Ruiz v. Mashburn Transportation Services, Inc.*, Case Nos. BCV-
27 20-100972-JEB, BCV-21-101196-BCB, and BCV-22-100698-BCB, California Superior Court,
28 County of Kern;

1 t. *Torres, et al. v. Johnston Nurseries, FLP, et al.*, Case No. BCV-19-100830-
2 TSC, California Superior Court, County of Kern;
3 u. *Almorisi v. M.A. Mortenson Company, et al.*, Case Nos. BCV-23-100727 and
4 BCV-23-101522, California Superior Court, County of Kern;
5 v. *Pacheco, et al. v. JCC Logistics, Inc., et al.*, Case No. BCV-21-102266,
6 California Superior Court, County of Kern; and
7 w. *Reyes v 9to5 Seating LLC*, Case No. 23STCV17221, California Superior
8 Court, County of Los Angeles.

9 10. Recently, prior to formally joining J. Gill Law Group, P.C., I assisted the firm on a
10 bench trial for PAGA claims brought on behalf of a group of aggrieved employees in a wage-and-
11 hour class and representative PAGA action matter and on a jury trial for a sexual harassment case
12 in which the jury found in favor of plaintiff on all claims and awarded approximately \$10.7 million
13 in damages.

14 11. Since joining J. Gill Law Group, P.C., I have continued to practice law on behalf of
15 plaintiffs in employment matters, substantially in class and representative action cases. Among other
16 tasks, I oversee the settlements at J. Gill Law Group, P.C., as well as junior attorneys and support
17 staff.

18 12. I have attended various Continuing Legal Education courses and labor and
19 employment conferences pertaining to advocacy on behalf of employees, and particularly in
20 connection with litigating wage-and-hour class actions and PAGA representative actions.

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

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

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

16. 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.

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

18. After diligent inquiry, neither I nor any member of J. Gill Law Group, P.C. 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 Portland, Maine.

/s/ *Ashlie E. Fox*

Ashlie E. Fox