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[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,

Plaintiff,

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

CLASS ACTION

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

**DECLARATION OF ALFREDO RIVERA
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Information:

Date: April 16, 2026

Time: 8:15 a.m.

Department: 2

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DECLARATION OF ALFREDO RIVERA

I, ALFREDO RIVERA, hereby declare:

1. I am over the age of eighteen and I submit this Declaration in support of the Motion for Preliminary Approval of the Class Action and PAGA Settlement in this matter. I have personal knowledge of the facts herein, and if called as a witness I could and would competently testify to them.

2. I am currently a resident of Tulare, California. I worked for Defendants Hollandia Dairy, Inc., Hollandia Farms North, Inc., and Hollandia Farms, Inc. (collectively, "Defendants") as an hourly-paid, non-exempt, full-time stylist from approximately 2014 to October 30, 2021. I retained the law firm of D.Law, Inc. to represent me in this class action lawsuit against Defendants for the alleged practices and violations as stated in the Operative Complaint in this action.

3. I believe that I am similarly situated to all other Class Members who worked for Defendants during the Class Period and who were similarly affected by Defendants' policies and practices regarding payment of minimum wages and overtime, meal periods, rest periods, vacation wages, final payment of wages, provision of accurate wage statements, production of requested employment records, alleged violations of the unfair competition law, and alleged violations under the Private Attorney Generals Act. I believe my claims against Defendants are typical of the other Class Members because I believe the claims asserted in the Operative Complaint are also shared by the other Class Members.

4. I understand that I am asking to be approved to serve as a Class Representative for the Settlement Class in this action, which I understand is defined as follows: all persons employed by any of the Defendants in California and classified as a non-exempt, hourly-paid employee who worked for any of the Defendants during the Class Period of October 20, 2017, through Preliminary Approval.

5. I also understand there are approximately 126 similarly situated employees that satisfy the Class definition. I also understand that I am serving as a representative Plaintiff on

1 behalf of other similarly situated aggrieved employees in California in connection with our
2 claims under Labor Code §§ 2698 *et seq.*, the Private Attorneys General Act (“PAGA”) for
3 penalties.

4 6. Additionally, I believe that my interests have been and continue to be aligned
5 with all Class Members. I believe my interests are the same as the other employees because we
6 were all subject to the same policies and practices and were similarly injured by Defendants’
7 company-wide policies and practices. I am seeking the same recovery on behalf of myself and the
8 other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by
9 Defendants. I have been and am willing to continue to pursue the Class Members’ claims
10 vigorously on our collective behalf. As a result, I firmly believe that I do not have any interests
11 that are adverse to the interests of the Class Members.

12 7. As a Class Representative, I believe I have maintained the best interests of the
13 Class Members. I have actively participated in this litigation and have been continuously
14 apprised of the progress of the case. I have provided documents and evidence to Class Counsel
15 in support of the class claims and discussed Defendants’ wage and hour policies and practices
16 at length with Class Counsel. I have also invested significant time and efforts in performing my
17 duties on behalf of the Class, including speaking to witnesses, preparing for settlement
18 negotiations, and reviewing the settlement. I estimate that I have devoted approximately 43
19 hours of my time to all of the above tasks to vigorously represent the interests of the Settlement
20 Class.

21 8. I also believe the Settlement obtained on behalf of the Settlement Class is fair and
22 reasonable in view of the facts, claims and the risk of going through further litigation in this case.

23 9. I have not yet received any consideration or promises that are different than any of
24 the other Class Members. In my opinion, the requested service payment of \$7,500.00 is fair and
25 reasonable given the risks I have taken, the tasks I have performed, the time I have invested, and
26 the real benefit which the Class Members will receive from this class action. I view this settlement
27 as fair and reasonable to all Class Members.

10. I freely chose to champion the interests of the Class and freely accepted the risks of being a Class Representative in a class action that could stigmatize me and, although unknown at this time, may affect my future employability in this industry or any other industry. Furthermore, although there is no record of such activity, I accepted the real risk of potentially being liable for the opposing parties' costs and attorneys' fees if I were unsuccessful in this lawsuit.

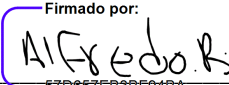
11. I have no known conflicts of interest with the settlement administrator, the *Cy Pres* recipients Visalia Rescue Mission and San Diego Rescue Mission, nor with the other Class Members or Class Representatives in this matter.

12. I am also aware of the fee splitting agreements between Class Counsel and I have signed an acknowledgment regarding this.

13. I will continue to actively participate in this lawsuit as necessary and will continue to make myself available to assist in this case moving forward as needed.

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

Executed on 3/10/2026, 2026, at Tulare, California.

Firmado por:

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 Alfredo Rivera