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 behalf of all others similarly situated

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

VANESSA GARCIA, LUCRECIA
 MENDOZA-RAMIREZ, ESTATE OF CESAR
 MENDOZA, SILVESTRE GARIBAY LEMUS,
 and JUAN G DE LEON, individually, on behalf
 of all others similarly situated, and on behalf of
 the State of California and other aggrieved
 persons,

Plaintiff,

vs.

CENTRAL VALLEY CHEESE, INC., a
 California corporation; and DOES 1 through 50,
 inclusive,

Defendants.

Case No. CV-21-004756

[Assigned for all purposes to the Honorable
 John D. Freeland, Department 23]

CLASS ACTION

**DECLARATION OF PLAINTIFF JUAN G
 DE LEON IN SUPPORT OF MOTION
 FOR PRELIMINARY APPROVAL OF
 CLASS ACTION AND PAGA
 SETTLEMENT**

Date: October 3, 2025
 Time: 8:30 a.m.
 Department: 23

Complaint Filed: August 31, 2021
 Trial Date: None Set

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ESTATE OF CESAR MENDOZA,

SILVESTRE GARIBAY LEMUS, and

JUAN G DE LEON, individually, and on
behalf of all others similarly situated

DECLARATION OF JUAN G. DE LEON

I, JUAN G DE LEON hereby declare as follows:

1. I am over the age of eighteen and I submit this Declaration in support of the Plaintiff's Motion for Preliminary Approval of Class Action and PAGA Settlement. The following is based upon my personal knowledge and if called as a witness, I could and would competently testify thereto.

2. I was employed by Defendant Central Valley Cheese, Inc. starting in January of 2018 through approximately March of 2022 as a Non-Exempt Employee working as a machine operator person for Defendant during the liability period.

3. As a non-exempt employee, I suffered the same damages as other non-exempt employees. These included not being paid all my wages, not provided accurate wage statements, not provide meal periods and rest breaks, not accurately or timely paid wages upon my separation from Defendant's employ and related claims all in accordance with California law. As a result of these alleged violations, I sought consultation with my attorneys at James Hawkins, APLC.

4. Based upon my allegations, and after consultation and full disclosure from my attorneys about the potential risks I faced as a Plaintiff in a putative class action, I freely decided to pursue this lawsuit to try and vindicate my rights and the rights of others who also worked for Defendant and suffered similar harms due to Defendant's common practices and policies.

5. Prior to filing my action, my attorneys and I had multiple conferences about the factual bases for the claims that I wanted to pursue against Defendant. During those conferences, my attorneys provided me with an overview of how those claims would be litigated and generally educated me about the nature of complex/representative litigation and my role as the representative Plaintiff.

6. My attorneys provided me with the complaint. I closely reviewed the complaint to ensure accuracy and completeness and as a result, I caused my attorneys to file the class action complaint alleging claims for the allegations alleged therein. Thereafter, I have been fully involved in my case. Following the filing of the complaint, I collaborated with my attorneys on

1 the prosecution of my claims, and I regularly contacted my attorneys to stay current on the status
2 of the litigation, and to discuss my attorneys' progress in prosecuting the claims.

3 7. Since I believe I was not accurately paid wages, not timely paid wages, not
4 provided meal and rest periods, not provided with all wages earned and owed upon my separation
5 from employment, and not provided accurate itemized wage statements and related claims. I
6 believe that I have been similarly injured as to all other class members in the settlement who
7 worked for Defendant during the class period. I believe the claims asserted in the Complaint and
8 First Amended Complaint is also shared by the other Class Members. I worked with various other
9 non-exempt employees and I believe we were all treated the same and subject to the same
10 unlawful policies.

11 8. On September 9, 2022, I, through my attorneys, and our co plaintiffs submitted a
12 notice with the Labor & Workforce Development Agency ("LWDA") alleging that Defendant.
13 violated a multitude of Labor Code sections pursuant to Labor Code section 2699

14 9. On September 30, 2022, I, through my attorneys, and along with my co Plaintiffs
15 filed this action against Defendant for Defendant's alleged failure to: (a) pay wages including
16 overtime, (b) provide meal periods for every work period exceeding more than ten (10) hours per
17 day and failure to pay an additional hour's of pay or accurately pay an additional hour's of pay in
18 lieu of providing a meal period; (c) provide rest breaks for every four hours or major fraction
19 thereof worked and failure to pay an additional hour's of pay or accurately pay an additional
20 hour's of pay in lieu of providing a rest period; (d) pay all wages earned and owed timely both
21 during and upon separation from Defendant's employ, (e) provide accurate itemized wage
22 statements, (f) failure to reimburse expenses, (g) various consumer credit claims under the
23 reimburse necessary business expenses and (f) for unfair competition ("UCL").

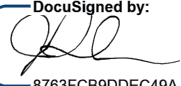
24 10. Since I agreed to become a Class Representative, I have worked every step of the
25 way with my attorneys. During the course of the litigation I have always kept the best interest of
26 the Class Members on equal footing as mine.

27 11. As one of the Class Representatives, I have spent numerous hours consulting with
28 my attorneys, providing documentation, consulting with other Class Members, responding to

1 questions by my attorneys, providing documents to my attorneys, working with my attorneys to
2 review documents received, helping my attorneys in preparing for the mediation and attending the
3 mediation via telephone. I was consulted about the status of the case and provided constant
4 feedback about the case from my attorneys including the mediation, settlement negotiations and
5 eventual settlement. I estimate I have spent approximately 30-40 hours working on this case.

6 12. From the beginning of this case, I have freely chosen to accept the risks of
7 being one of the Class Representatives in this class action lawsuit. I also believe the requested
8 Class Representative Service Payment is fair and reasonable because my decision to accept the
9 risk of being a Class Representative in a class action under the Labor Code may affect my future
10 ability to get other jobs in this industry. I also understood and accepted the risk of potentially
11 being liable for the opposing parties' costs and attorneys' fees if I was unsuccessful in this
12 lawsuit. I voluntarily assumed these real and large risks and the case would not have been
13 brought without me and the other class members. I believe the Class Members will receive a
14 good benefit by resolving their claims against Defendant under the terms of the settlement. As a
15 result of my efforts, I also believe the Class Representative Service Award is reasonable, and I
16 respectfully request the Court approve the amount of \$10,000.00 to each named Plaintiff as fair
17 and reasonable.

18 I declare under penalty of perjury under the laws of the state of California that the
19 foregoing is true and correct. Executed on September 9, 2025, at Carson, California.

20 DocuSigned by:
21 
22 8763FCB9DDEC49A...

23 **JUAN G DE LEON**
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