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9 Attorneys for Plaintiff Enrique Barajas

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF MADERA**

15 ENRIQUE BARAJAS, on behalf of himself and
16 all other aggrieved employees,

17 Plaintiff,

18 v.

19 VLOT CALF RANCH, INC., a California
20 corporation; CASE VLOT, an individual; AND
21 DARCY VLOT, an individual; and DOES 1
through 100, inclusive,

22 Defendants.

Case No.: MCV087569
[Hon. Michael J. Jurkovich, Dept. 411B]

**DECLARATION OF PLAINTIFF
ENRIQUE BARAJAS IN SUPPORT OF
MOTION FOR APPROVAL OF
REPRESENTATIVE PAGA
SETTLEMENT**

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1. Since at least November 2021, I have been working with my attorneys on this case. In addition to my individual claims, we decided to bring representative claims because I believed that my experiences were shared by the other employees of Vlot Calf Ranch, Inc. (“Vlot”).

2. Since 2021, I estimate I have spent at least 75-100 hours involved in this case. Throughout this case, I have had regular telephone calls and Zoom meetings with my attorneys about the claims in the case, my work experiences, possible witnesses, locating documents, preparing for depositions, responding to discovery, and other case strategy.

3. I appeared for a full day of deposition and had preparation meetings with my attorneys. I also helped my attorneys prepare to take depositions of Vlot. I also attended and actively participated in two full-day mediations. The first mediation was on December 19, 2022 and the second mediation was on January 20, 2025. Before each mediation, I had multiple meetings and calls with my attorneys about strategy and preparation.

4. For each day of deposition and mediation, I had to miss a day of work, without any pay. This loss of income has been very difficult for me, but I was dedicated to this case and believes that it would help improve working conditions for Vlot's employees. I also understand there is a risk that future employers may not want to hire me because I brought a lawsuit against my former employer.

5. I am proud of my role in this case, and the proposed settlement my attorneys and I reached with Vlot. Because I brought these claims, I am informed and believe that Vlot has made

1 positive changes for its employees. For example, I am informed that Vlot is now correctly paying
2 irrigators their overtime and paid them any overtime owed. I also am informed that Vlot has
3 improved its meal and rest period practices. I am glad that my efforts in this case were successful
4 and that I could help the working conditions for Vlot's employees.

5 6. My attorneys and I have asked that I receive an enhancement payment of \$10,000
6 for my role as a PAGA representative and my time and assistance on this case. I also understand
7 there is no guarantee that I will receive any enhancement payment.

8 7. I respectfully ask that the Court approve the request for an enhancement payment.
9

10 I declare under penalty of perjury under the laws of the State of California that the
11 contents of this declaration are true and correct. Executed on March 28, 2025, at Merced,
12 California.
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14 E.B.
15 Enrique Barajas
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5. Me enorgullece mi papel en este caso y el acuerdo propuesto al que mis abogados y yo llegamos con Vlot. Debido a que presenté estos reclamos, se me ha informado y creo que Vlot ha realizado cambios positivos para sus empleados. Por ejemplo, tengo entendido que ahora Vlot está pagando correctamente las horas extras a los regadores y les ha pagado cualquier tiempo extra adeudado. También tengo entendido que Vlot ha mejorado sus prácticas de descansos para comidas y pausas. Me alegra que mis esfuerzos en este caso hayan tenido éxito y que haya podido contribuir a mejorar las condiciones de trabajo para los empleados de Vlot.

6. Mis abogados y yo hemos solicitado que yo reciba un pago de bonificación de \$10,000 por mi papel como representante de PAGA y por mi tiempo y asistencia en este caso. También entiendo que no hay garantía de que reciba ningún pago de bonificación.

7. Respetuosamente solicito que el Tribunal apruebe la petición de un pago de bonificación.

Declaro bajo pena de perjurio conforme a las leyes del Estado de California que el contenido de esta declaración es verdadero y correcto. Firmado el 28 de marzo de 2025 en Merced, California.

9.13.

Enrique barajas (Mar 28, 2025 13:39 PDT)

Enrique Barajas