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Attorneys for Plaintiffs
RYAN CHANLEY, OLIVIER LARA, VERONICA MEDINA, and CELIA OROZCO on
behalf of themselves and all similarly situated employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF MONTEREY

RYAN CHANLEY on behalf of himself
and all similarly situated employees

Plaintiff,

vs.

GROWERS TRANSPLANTING, INC., a
California corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No. 22CV002837

**DECLARATION OF OLIVIER LARA IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: March 22, 2024
Time: 8:30 a.m.
Dept.: 15

Complaint Filed: September 22, 2022
Trial Date: Not Set

1 I, Olivier Lara, hereby declare and state as follows:

2 1. I am an individual over the age of 18 years old and am a resident of California. I
3 am a named Plaintiff in this matter. I have personal knowledge of the facts set forth below, and
4 if called to testify, I could and would do so competently.

5 2. I was employed by Defendant Growers Transplanting, Inc. ("Defendant") from
6 approximately 2011 through approximately March 31, 2020, as a general laborer at
7 Defendant's Encinal Road #1 facility in Salinas, California.

8 3. During my employment with Defendant, I alleged that I was not provided legally
9 compliant meal and rest periods, paid for all hours worked, paid my final wages upon
10 termination, or reimbursed for all business expenses. Because of these violations, I also
11 alleged that I was not provided with accurate and complete wage statements..

12 4. I understand that this action was brought on behalf of all other non-exempt
13 hourly employees in the State of California, and I am acting as a representative for the Class.
14 As a class representative, I understand that it is my responsibility to act in the best interest of
15 the Class and not my own. I agree that I will not put my own interests ahead of that of the
16 Class and that I will not settle my claims separately or independently from the Class.
17 Moreover, I am not aware of any conflicts that exist between my interests and the interests of
18 the Class that would impair or affect my ability to serve as a representative for the Class. I
19 have and continue to be willing to assist in the investigation of this matter, including providing
20 any necessary information and documents, as well as make myself available for any further
21 proceeding in this matter as required to represent the interests of the Settlement Class. I also
22 understand my duties and responsibilities to the proposed class and will carry out those duties
23 as necessary.

24 5. I have discussed the terms of the settlement with my attorneys, and based on the
25 information provided, I believe the settlement to be fair, adequate, and reasonable for myself
26 and for the entire Settlement Class.

27 6. My first language is Spanish, and I speak no English. Jackie Mireles orally
28 translated the contents of this declaration from English to Spanish for me before I signed

1 it. Ms. Mireles speaks my language fluently and appeared to have no difficulty understanding
2 me. Likewise, I had no difficulty understanding Ms. Mireles. Ms. Mireles read the entire
3 contents of this declaration to me in Spanish before I signed it, and the translation she read to
4 me was a true and accurate recitation of the testimony I wish to present to the court.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct and if called as a witness I could and would competently testify to
7 each of the matters stated herein, and I state that these matters are based upon my own
8 personal knowledge acquired through first-hand observation, except where stated otherwise.
9 This declaration was executed by me on February 28, 2024, in Salinas, California.

10
11 Olivier Lara
Olivier Lara