

B. James Fitzpatrick (SBN: 129056)
 Laura L. Franklin (SBN: 282642)
 FITZPATRICK & SWANSTON
 555 S. Main Street
 Salinas, CA 93901
 Telephone: (831) 755-1311
 Facsimile: (831) 755-1319

Larry W. Lee (SBN: 228175)
 Max W. Gavron (SBN: 297691)
 Mai Tulyathan (SBN: 316704)
 DIVERSITY LAW GROUP, P.C.
 515 South Figueroa Street, Suite 1250
 Los Angeles, California 90071
 Telephone: (213) 488-6555
 Facsimile (213) 488-6554

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 CELIA OROZCO 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, Celia Orozco, 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 Nor-West, Inc. ("Nor-West) from approximately
6 July 16, 2021, through approximately August 8, 2021, as a farm labor contractor employee,
7 and assigned to Defendant Growers Transplanting, Inc.'s ("Growers") Encinal Road #1 and #2
8 facilities in Salinas, California.

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

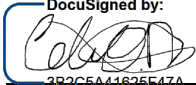
13 4. I understand that this action was brought on behalf of all other non-exempt
14 hourly employees in the State of California, and I am acting as a representative for the Class.
15 As a class representative, I understand that it is my responsibility to act in the best interest of
16 the Class and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

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

28 I declare under penalty of perjury under the laws of the State of California that the

foregoing is true and correct and if called as a witness I could and would competently testify to each of the matters stated herein, and I state that these matters are based upon my own personal knowledge acquired through first-hand observation, except where stated otherwise.

This declaration was executed by me on February 28, 2024, in Salinas, California.

DocuSigned by:


392C5A44826F47A...
Celia Orozco