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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 RYAN CHANLEY 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, Ryan Chanley, 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 August 2020 to approximately January 2022 as a Production Business Manager.

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

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

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

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct and if called as a witness I could and would competently testify to
26 each of the matters stated herein, and I state that these matters are based upon my own
27 personal knowledge acquired through first-hand observation, except where stated otherwise.

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

2 DocuSigned by:
3 
4 B18FE50D897A4CC...
5 Ryan Chanley