

Larry W. Lee (State Bar No. 228175)
lwlee@diversitylaw.com
Christine S. Lee (State Bar No. 339947)
christine@diversitylaw.com
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa St., Suite 1250
Los Angeles, California 90071
(213) 488-6555
(213) 488-6554 facsimile

Attorneys for Plaintiff Jared Deaver and the Class
(ADDITIONAL COUNSEL ON NEXT PAGE)

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

JARED DEAVER, as an individual and on
behalf of all others similarly situated,

Plaintiff,

v.

BLUE DIAMOND GROWERS, a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Lead Case No. 34-2022-00316490-CU-OE-
GDS

[Consolidated with Case No. 34-2021-
00304425- CU-OE-GDS and Case No. 34-2022-
00319378]

*Assigned for All Purposes to Honorable
Lauri A. Damrell in Dept 22*

**DECLARATION OF PLAINTIFF JARED
DEAVER IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: January 31, 2025

Time: 9:00 a.m.

Department: 22

RES. ID: ***

Action Filed: March 9, 2022

Trial Date: None yet

AND RELATED CONSOLIDATED CASES.

ADDITIONAL COUNSEL

William L. Marder (SBN 170131)
bill@polarislawgroup.com
POLARIS LAW GROUP
501 San Benito Street, Suite 200
Hollister, CA 95023
Telephone: (831) 531-4214
Facsimile: (831) 634-0333

Edward W. Choi, Esq. SBN 211334
edward.choi@choiandassociates.com
LAW OFFICES OF CHOI & ASSOCIATES
515 S. Figueroa St., Suite 1250
Los Angeles, CA 90071
Telephone: (213) 381-1515
Facsimile: (213) 465-4885

Attorneys for Plaintiff Jared Deaver and the Class

David Bibiyan, SBN 287811
david@tomorrowlaw.com
Jeffrey D. Klein, SBN 297296
Jeff@tomorrowlaw.com
Vedang J. Patel, SBN 328647
vedang@tomorrowlaw.com
Bibiyan Law Group, P.C.
8484 Wilshire Blvd., Suite 500
Beverly Hills, CA 90211
Telephone: (310) 556-4811

Attorneys for Plaintiffs
Daniel Ramirez and Brad Smith, et al.

Zachary M. Crosner (SBN 272295)
zach@crosnerlegal.com
Brandon Brouillette (SBN 273156)
bbrouillette@crosnerlegal.com
Chad Saunders (SBN 257810)
chad@crosnerlegal.com
CROSNER LEGAL, PC
9440 Santa Monica Blvd. Suite 301
Beverly Hills, CA 90210
Tel: (866) 276-7637

Co-Counsel for Plaintiffs
Daniel Ramirez and Brad Smith, et al.

I, Jared Deaver, hereby declare and state as follows:

1. I am an individual over the age of 18 year and the named Plaintiff in the above-captioned matter. I have personal knowledge of the facts contained in this declaration, and if called as a witness, could and would testify as to their accuracy.

2. I was formerly employed by Defendant BLUE DIAMOND GROWERS (“BDG” or “Defendant”) as a Machine Operator. My employment with Defendant was terminated on or about February 4, 2022.

3. I believe Defendant failed to pay minimum and overtime wages, failed to provide compliant meal and rest break periods, failed to reimburse business expenses and failed to provide accurate wage statements.

4. I do not believe I have any interests that are adverse to the other employees that are part of this settlement.

5. I understand that the filing of this action was a matter of public record and that this was being prosecuted on a representative basis. I understand that a representative action would take longer in litigation than an individual action and undertook such risks. I have not incurred any expenses, but have expended a significant amount of time on this matter.

6. During the course of this litigation, I have always made myself available to answer questions, gather and provide documents, review and execute the settlement agreement and this declaration. I will continue to make myself available to review any other documents needed to bring this matter to conclusion. I estimate that I have spent 30 hours in the prosecution of this action.

7. As part of the Settlement Agreement, I understand that I will be providing a general release of my own individual claims, something that the Settlement Class Members did not have to do.

8. I have previously signed an agreement for Plaintiffs’ Counsel to be splitting the approved fees as follows: 35% to the Bibyian Law Group, P.C.; 35% to Crosner Legal, P.C.; 9.75% to Diversity Law Group; 9.75% to the Law Offices of Choi & Associates and 10.5% to the Polaris Law Group.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3 Executed on December 13, 2024, at Los Angeles, California.

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5 Signed by: 
6 13AB3302741E6 Jared Deaver
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