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Attorneys for Plaintiff Jose Ramon Perez Vaca, on behalf of himself and all “aggrieved employees” pursuant to Labor Code § 2698 *et seq.*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF FRESNO

JOSE RAMON PEREZ VACA, on behalf of
himself and all “aggrieved employees”
pursuant to Labor Code § 2698 *et seq.*,

Plaintiffs,

v.

SRAN AG II, INC., a California corporation,
and DOES 1 through 10, inclusive,

Defendants.

CASE NO: 22CECG03802

*Assigned to the Hon. Jeffrey Y. Hamilton,
Dept. 503*

**DECLARATION OF JOSE RAMON
PEREZ VACA IN SUPPORT OF
UNOPPOSED MOTION FOR AN
ORDER APPROVING SETTLEMENT
OF CLAIMS BROUGHT PURSUANT
TO THE PRIVATE ATTORNEYS
GENERAL ACT OF 2004, AWARDED
ATTORNEYS’ FEES, COSTS,
ENHANCEMENT AWARD PAYMENT,
AND REIMBURSEMENT OF
SETTLEMENT ADMINISTRATION
EXPENSES, AND DISMISSING
ACTION WITH PREJUDICE**

Date: February 29, 2024

Time: 3:30 p.m.

Dept.: 503

Complaint Filed: November 29, 2022

Trial Date: December 9, 2024

1 I, JOSE RAMON PEREZ VACA, hereby declare and state as follows:

2 1. I am a named Plaintiff in this lawsuit against Defendant SRAN AG II, Inc.
3 (“Defendant”) and I submit this declaration in support of Plaintiff’s Unopposed Motion
4 For An Order Approving Settlement Of Claims Brought Pursuant To The Private
5 Attorneys General Act Of 2004, Awarding Attorneys’ Fees, Costs, Enhancement Award
6 Payment, And Reimbursement Of Settlement Administration Expenses, And Dismissing
7 Action With Prejudice. I am a competent adult and worked for Defendant as a non-exempt
8 employee during the relevant time period. I have personal knowledge of the facts set forth
9 herein, and if called as a witness to testify to them, I could and would do so competently.

10 2. I contacted my current attorneys when I questioned the employment
11 practices of Defendant prior to commencing this lawsuit. I accepted the opportunity to
12 act as a representative on behalf of other employees of Defendant in this action whom I
13 believed were being subjected to labor law violations. I pursued this case on a
14 representative basis so that I could help other employees recover for what I believed were
15 Defendant’s improper practices.

16 3. Specifically, I questioned Defendant’s policies of failing to pay all
17 minimum and overtime wages earned; failing to provide legally compliant meal and rest
18 periods, or compensation in lieu thereof; failing to reimburse for all necessary business
19 expenses incurred; requiring employees to work seven or more days in a row; failing to
20 issue accurately itemized wage statements; making improper deductions from wages; and
21 failing to timely pay all wages due at the separation of employment. Through many
22 discussions with my lawyers, I learned these may be illegal practices and Defendant’s
23 employees might have recourse for them.

24 4. By bringing this lawsuit, and throughout its course, I have put the interests
25 of other employees ahead of my own. I understood that I could possibly earn an incentive
26 award if this case resolved itself favorably, but I also knew that I could also be responsible
27 for paying Defendant’s attorneys’ fees and costs if it did not.

1 5. My goal in bringing this lawsuit was to obtain a recovery on behalf of all
2 employees of Defendant, and even more importantly, to put an end to what I believed
3 were illegal practices on the part of Defendant. I believe I have achieved both through
4 this lawsuit and settlement.

5 6. I am very happy about the results of this litigation. I am satisfied that
6 Defendant is compensating other Aggrieved Employees and the State for penalties that I
7 believe we are due.

8 7. At the onset of this case, I spent time through numerous phone calls with
9 several of my attorneys explaining what I understood to be Defendant's policies and
10 practices and how they were applied to other employees. I kept actively involved with the
11 status of this case throughout the litigation process, tracking the status of the case and
12 participating as much as possible.

13 8. While I have not maintained detailed time records of my activities in
14 connection with this litigation, I believe that I have spent a total of approximately 15-20
15 hours assisting my attorneys with the preparation of this case and doing work and
16 investigation of the facts independent from my attorneys both before and during this case.

17 9. Before this litigation commenced, and throughout its course, I spent
18 approximately 3-4 hours gathering, organizing, and reviewing documents and information
19 for this lawsuit. I sifted through many of my own documents and reviewed information
20 produced by Defendant as part of this litigation.

21 10. I communicated with my attorneys several times per month to track my
22 case's status. I have taken an active involvement in this matter throughout its course.

23 11. Taking the initiative with this case was very risky for me, both
24 professionally and financially. I put principal first and took a tremendous risk by filing
25 this lawsuit. I am quite confident that pursuing this lawsuit will result in future
26 reputational harm to me. There is a stigma associated with suing one's former employer.
27 I suspect I may be adversely affected when it comes to obtaining future employment –
28

1 employers who discover that I sued Defendant in a representative action will likely avoid
2 hiring me.

3 I declare, under penalty of perjury, under the laws of the State of California and the
4 United States of America, that the foregoing is true and correct. Executed on November
5 8, 2023 at Madera, California.

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7 *Jose R Perez vaca*

8 JOSE RAMON PEREZ VACA
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