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Attorneys for Plaintiff

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

JORGE DAGOBERTO RIVERA CAMACHO,
on behalf of the State of California and other
aggrieved persons,

Plaintiff,

v.

BRAGA FRESH FOODS, LLC, a California
Limited Liability Company; and DOES 1
through 10, inclusive,

Defendants.

Case No.: 22CV002573

PAGA REPRESENTATIVE ACTION

*[Assigned for all purposes to: Hon. Thomas
W. Wills, Dept. 15]*

**SUPPLEMENTAL DECLARATION OF
PLAINTIFF JORGE DAGOBERTO
RIVERA CAMACHO IN SUPPORT OF
PLAINTIFF'S MOTION TO APPROVE
PAGA SETTLEMENT**

SUPPLEMENTAL DECLARATION OF PLAINTIFF JORGE DAGOBERTO RIVERA
CAMACHO

I, Jorge Dagoberto Rivera Camacho, declare as follows:

1. I am an adult resident of the State of California, and, if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am a former employee of Braga Fresh Foods, LLC ("Defendant"). I worked for Defendant from approximately 2019 to approximately October 2021 as an hourly-paid, non-exempt employee. At the end of my employment, I was earning approximately \$16.00 per hour.

4. I am not receiving any additional consideration as part of the settlement.

5. As indicated in my original declaration in support of the Motion to Approve PAGA Settlement, I have spent approximately 40 hours on this case. In addition to the efforts outlined in my original declaration, I also, *inter alia*:

- a) Participated in a comprehensive "intake process" (in November 2021) where I thoroughly discussed my potential claims against Defendant with a Wilshire Law Firm representative;
- b) Communicated with Wilshire Law Firm regarding the retainer agreement and what was to come after I signed the retainer agreement, which included over a dozen phone calls, emails and text messages;
- c) Reviewed my personnel file with my attorneys in order to understand the documents that were produced by Defendant;
- d) Discussed the potential claims in further detail with my attorneys prior to initiating an action against Defendant;

- 1 e) Reviewed the arbitration agreement produced by Defendant and its
2 impact on the matter;
- 3 f) Participated in multiple phone calls with my attorneys prior to the August
4 2023 mediation where we discussed the claims to be advanced at the
5 mediation, what to expect from Defendant and Defendant's counsel, and
6 potential outcomes; and
- 7 g) Communicate(d) with my attorneys after the August 2023 mediation
8 regarding the settlement and approval process.

9 I declare under penalty of perjury under the laws of the State of California and the United
10 States that the foregoing is true and correct.

11 Executed on 4/25/2024, at City salinas, California.

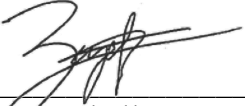
12 DocuSigned by:
13 
14 0E97E24301A5475...
15 Jorge Dagoberto Rivera Camacho

Camacho, et al. v. Braga Fresh Foods, LLC
22CV002573

PROOF OF SERVICE

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

3 Executed on **April 26, 2024** at Irvine, California.

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6 Zeyra Ceballos
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