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

SOCORRO OCHOA, ANA GAYTAN
GARCIA, TERESA GONZALEZ VEGA,
LILIANA J. MOISEN, ANDREA GARCIA
CERVANTES, and CECILIA CERVANTES,
individually, and on behalf of all others similarly
situated; ANA GAYTAN GARCIA and
TERESA GONZALEZ VEGA, on behalf of the
State of California and other aggrieved persons,

Plaintiffs,

v.

LA TAVOLA, LLC, a California limited
liability company; BBJ RENTALS INC., a
corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 22CV000862

CLASS & REPRESENTATIVE ACTION

**DECLARATION OF PLAINTIFF
TERESA GONZALEZ VEGA IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

DECLARATION OF PLAINTIFF TERESA GONZALEZ VEGA

I, Teresa Gonzalez Vega, 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 La Tavola, LLC and BBJ Rentals Inc. (collectively, “Defendants”). I worked for Defendants from approximately September 2019 to approximately March 25, 2022 as an hourly-paid, non-exempt employee. Throughout the entirety of my employment, I was subject to all of Defendants’ policies and practices that have been alleged as unlawful in the First Amended Class & Representative Action Complaint.

4. I initiated a separate lawsuit (Napa County Superior Court, Case No. 23CV000638) against Defendants because I was concerned that I was not paid properly for all the hours that I worked, and I was not provided all of my meal and rest breaks. By originating the separate lawsuit against Defendants, I hoped that I might be able to change Defendants’ policies to better protect the working conditions of my co-workers. I ultimately joined this action as a class representative.

5. I have devoted a significant amount of my own time and energy to this lawsuit—approximately 35 hours in total. I made it a priority to stay active in the process so I could do all I could to support my attorneys in pursuing these claims.

6. Over the course of the litigation, I spent extensive time on phone calls with my attorneys, both to receive updates and to share information. During some of those conversations, we were able to pinpoint specific occasions where I had not been paid correctly. In addition, as we approached mediation in October 2023, I had multiple, in-depth discussions with my attorneys about the core issues and what to anticipate.

7. I also worked diligently to locate and send my attorneys any documents relevant to the claims, devoting numerous hours to gathering them before mediation. I made sure to review legal documents thoroughly—including the retainer and settlement agreement—and discussed their terms in detail with my attorneys.

8. On the day of mediation, I made myself completely available and remained in close contact with my attorneys to address any questions or issues that arose.

9. I believe the settlement reached is fair, adequate, and reasonable, and I would strongly urge the Court to approve it. I am pleased I had the opportunity to serve as a class representative and help secure a settlement that benefits the class.

10. The decision to join a class action was not something I took lightly. I knew it would bring public attention, and my name would be tied to a lawsuit against my former employer. I also understood that future employers might discover I had sued Defendants. However, I felt there were important rights at stake that affected everyone, and I wanted to take action.

11. I recognized the financial risks as well; for instance, if I lost the case, I might have been held responsible for Defendants' attorneys' fees and costs.

12. Under the settlement agreement, I am eligible to receive a service payment of up to \$7,500. I believe this amount fairly compensates me for the time and effort I invested, as well as the potential risks to my future employment. I also acknowledge that I have signed a general release broader than the one binding other class members, and I will receive no compensation beyond what is specified in the settlement.

13. In light of my role and the positive impact this case has had on my former co-workers, I feel proud to have stood up for employees who were too fearful of losing their jobs or facing the stigma of suing an employer. I was willing to take that risk because I genuinely care about safeguarding the rights and well-being of my former colleagues.

14. I reviewed and signed the Class Action and PAGA Settlement Agreement in full and my attorneys answered all the questions I had. I believe the settlement terms and allocations are fair, adequate, and reasonable given the strength of the class claims and Defendants' defenses.

15. I have no conflicts of interest with any class member or the Settlement

1 Administrator, ILYM Group, Inc.

2 16. I am not aware of any other pending matter or action asserting claims that will be
3 extinguished or adversely affected by the Settlement.

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

6 Executed on 12/27/2024, at 12 -27-2024, California.

7
8 DocuSigned by:
9 
10 222623501757490
11 Teresa Gonzalez Vega

PROOF OF SERVICE

Ochoa v. La Tavola, LLC, et al.
22CV000862

STATE OF CALIFORNIA)
) ss
COUNTY OF ORANGE)

I, Zeyra Ceballos, state that I am employed in the aforesaid County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 15707 Rockfield Blvd., Suite 250, Irvine, California 92618. My electronic service address is zeyra.ceballos@wilshirelawfirm.com.

On **December 30, 2024**, I served the foregoing **DECLARATION OF PLAINTIFF TERESA GONZALEZ VEGA IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**, on the interested parties by placing a true copy thereof, enclosed in a sealed envelope by following one of the methods of service as follows:

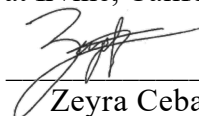
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Attorneys for Defendants

- (X) **BY UPLOAD:** I hereby certify that the documents were uploaded by my office to the State of California Labor & Workforce Development Agency Online Filing Site.
- (X) **BY E-MAIL:** I hereby certify that this document was served from Irvine, California, by e-mail delivery on the parties listed herein at their most recent known email address or e-mail of record in this action.

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

Executed on **December 30, 2024** at Irvine, California.



Zeyra Ceballos