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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BENITO**

ESPIRIDION GOPAR, an individual and on
behalf of all others similarly situated,

Plaintiff,

TAYLOR FARMS RETAIL, INC.; and DOES 1
through 50, inclusive,

Defendant.

Case No. CU-24-00222

**DECLARATION OF PLAINTIFF ADOLFO
ESQUIVEL ILLU IN SUPPORT OF
PLAINTIFFS' MOTION FOR APPROVAL
OF PAGA SETTLEMENT UNDER
CALIFORNIA LABOR CODE § 2698 ET
SEQ.**

[Assigned for all purposes to The Honorable
Omar Rodriguez, Dept. 1]

Date: June 22, 2026
Time: 10:30 a.m.
Dept.: 1
Action Filed: September 11, 2024
Trial Date: None Set

**DECLARATION OF PLAINTIFF ADOLFO ESQUIVEL ILLU IN SUPPORT OF PLAINTIFFS' MOTION
FOR APPROVAL OF PAGA SETTLEMENT UNDER CALIFORNIA LABOR CODE § 2698 ET SEQ.**

DECLARATION OF ADOLFO ESQUIVEL ILLU

I, Adolfo Esquivel Illu, declare as follows:

1. I am an individual over the age of 18. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I am one of the named plaintiffs in the above-reference action and submit this declaration in support of the Motion for Approval of PAGA Settlement. Before signing the PAGA Settlement Agreement (“Settlement Agreement” or “Agreement”), I read and discussed the terms of the Agreement with my attorneys. I believe that this settlement is fair, adequate, and reasonable.

3. I first started working for Defendant Taylor Farms Retail, Inc. (hereafter “Defendant” or “Taylor Farms”) on or around July 21, 2019 as a crew member/laborer. My employment with Defendant ended on or around August 22, 2025

4. I understand that this lawsuit is a Private Attorney General action, otherwise known as a PAGA lawsuit. I understand that I am one of the named Plaintiffs and that Taylor Farms is the Defendant. I understand that I am the representative of other Taylor Farms employees. As a representative in this lawsuit, I have duties to the State of California and other employees like me. I also understand that my lawsuit is on behalf of the State of California. I have fairly represented the other employees and the State throughout this lawsuit.

5. I understand that the Court will decide whether to approve the Settlement if it is in the best interests of Defendant’s other hourly employees and the State. I don’t have any disagreements with the other Taylor Farms employees I represent. I am not aware of any reason why I can’t make the best decisions for them in this lawsuit.

6. I understand that my attorneys have asked the Court to pay me \$2,500.00 as a PAGA Representative Service Payment for my contribution to this case. I believe this amount is fair for the time I have spent and my involvement in this lawsuit. I also believe it is fair because of the risk that the Court could order me to pay Taylor Farms’s court costs if I lose the case. I think it is fair that the Court pay me the \$2,500.00 award for these reasons and others I list below.

7. When I agreed to hire my attorneys to file this lawsuit, I also agreed that I would be the representative of the other employees and the State of California. In agreeing to be their

representative, I agreed that the interests of the other employees and the State in the lawsuit are as important as my personal interests in suing Taylor Farms. I agreed that I would do what is in the best interest of the other employees and the State when deciding whether or not to settle this lawsuit. I also agreed to actively participate in the lawsuit. I also understand that there will only be a settlement of the lawsuit if the Court allows it. As the representative of the other employees and the State of California, I have agreed to follow the progress of the lawsuit. I have done this since I hired my attorneys by reading the court documents they send me and by speaking with them over the phone.

8. The PAGA statute does not forbid service awards. Courts frequently award them in PAGA-only cases as well. The work I have done on this case includes hiring my attorneys, speaking with my attorneys on many occasions by phone, explaining what my employment at Taylor Farms was like, explaining what my employment at Taylor Farms had in common with other employees who worked for Taylor Farms, explaining my claims to my attorneys, and communicating with my attorneys about the settlement agreement and related documents. I have also carefully reviewed the Settlement Agreement and other documents to make sure that the Settlement and other work my attorneys performed are in the best interests of the employees and the State of California.

9. Based on the time I have spent on the lawsuit, the risk I will have to pay Taylor Farms's court costs if I lose, the harm to my chances of getting jobs in the future, my request for an award of \$2,500.00 is fair and reasonable.

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

Executed on May 28, 2026 at Hollister, California.

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Adolfo Esquivel Illu