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16  
17 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
18 **FOR THE COUNTY OF SAN BENITO**  
19

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

22 Plaintiff,

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

25 Defendant.

Case No. CU-24-00222

**DECLARATION OF PLAINTIFF  
ESPIRIDION GOPAR 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 ESPIRIDION GOPAR**

I, Espiridion Gopar, 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 discussed the terms of the Agreement with my attorneys. I believe that this settlement is fair, adequate, and reasonable.

3. I worked for Defendant Taylor Farms Retail, Inc. (“Defendant” or “Taylor Farms”) at its San Juan Bautista location from July 21, 2019 to the present, except for a brief period in October 2023. I worked as a general laborer. Throughout my employment with Taylor Farms, I have been an hourly, non-exempt employee.

4. I believe that Taylor Farms did not always provide duty-free breaks to me and other employees. The production lines remained operational throughout my shift. Due to the workload and/or insufficient staffing, there were days when employees were not relieved in time to take compliant meal and rest breaks. As a result, employees sometimes missed rest periods or were not provided with an uninterrupted 30-minute meal period before the start of the fifth hour of work. To my knowledge, Taylor Farms did not pay employees one additional hour of pay at their regular rate of compensation for each missed, late, or interrupted meal or rest period.

5. During the COVID-19 pandemic, I was required to undergo a temperature check at the start of my workday. Before clocking in, I had to wait in line for approximately 10 minutes without pay.

6. I filed this lawsuit with no guarantee of personal benefit. As a current employee, I brought this case because I was concerned that Taylor Farms was not treating its employees fairly, including by failing to pay all wages owed and failing to provide proper breaks. I hoped that, by coming forward, I could help bring about changes to Taylor Farms’ policies and better protect the working conditions of employees.

7. I understood that, by bringing this action, I was stepping into the shoes of the state

1 labor agency and representing other hourly employees of Taylor Farms. I believe that my interests  
2 have been and continue to be aligned with the hourly employees I represent in this lawsuit. I do not  
3 have any interests that are adverse to the interests of my co-workers.

4 8. I understood that I was expected to represent the other employees' interests, placing  
5 them ahead of my own. Because of that responsibility, I made it a priority to remain actively involved  
6 in the case. I estimate that I spent at least 35 or more hours on this matter, including: (1) participating  
7 in phone calls with my attorneys and their staff to discuss the claims alleged in my lawsuit and status  
8 of the case; (2) reviewing key case documents prepared on my behalf, such as the PAGA Notice, my  
9 demand for arbitration, and my declaration regarding the COVID-19 procedures; (3) providing my  
10 attorneys with information and documents relevant to the temperature screenings, meal period  
11 procedures, and call-in requirements; (4) reviewing and executing the Settlement Agreement; and  
12 (5) reviewing and signing my declaration submitted to this Court in support of the settlement.

13 9. As a current employee, I did not make the decision to file a lawsuit lightly. I was  
14 concerned about the attention that a publicly filed lawsuit could bring and the possibility of  
15 retaliation, tension in the workplace, and negative treatment by supervisors or coworkers. I was also  
16 mindful that prospective employers might learn that I brought claims against Taylor Farms, which  
17 could affect my future employment opportunities. Even so, I believed it was important to pursue this  
18 case because the issues raised in it affected not only me, but other employees as well

19 10. Additionally, I am aware and have been aware from the inception of the case, that  
20 there is the risk that if I do not win this lawsuit, then I could be liable for Defendant's litigation fees  
21 and costs. If I had lost the case and been ordered to pay Defendant's litigation costs, it would have  
22 been financially devastating to me.

23 11. I understand that the Settlement Agreement provides a PAGA Representative Service  
24 Payment in the amount of \$2,500.00 to me and the other named plaintiffs. I believe this amount is  
25 fair and reasonable given the risks I have taken, the tasks I have performed, the time I have invested,  
26 and the real benefit which the State and Taylor Farms employees will receive from this action.

27 12. I understand my requested PAGA Representative Service Payment is subject to the  
28 Court's approval and discretion, and I respectfully request that the Court approve awarding it and

1 approve me to serve as the PAGA Representative for Settlement purposes.

2 13. My first language is Spanish, and I speak no English. Jackie Mireles orally translated  
3 the contents of this declaration from English to Spanish for me before I signed it. Ms. Mireles speaks  
4 my language fluently and appeared to have no difficulty understanding me. Likewise, I had no  
5 difficulty understanding Ms. Mireles. Ms. Mireles read the entire contents of this declaration to me  
6 in Spanish before I signed it, and the translation she read to me was a true and accurate recitation of  
7 the testimony I wish to present to the Court.

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

10 Executed on May 14, 2026, at Salinas, California.

11 Signed by:  
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14 Espiridion Gopar  
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