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Attorneys for Plaintiff and the Proposed Class

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

NANCY MARQUEZ MALDONADO
A.K.A. NANCY MALDONADO
MARQUEZ, an individual, on behalf of
herself and others similarly situated,

PLAINTIFF,

v.

BALDA C. BREWER, INC.; and DOES 1
thru 50, inclusive,

DEFENDANTS.

CASE NO. CIVSB2219827

[Case Assigned for All Purposes to Hon. in
Dept. S26]

**DECLARATION OF NANCY MARQUEZ
MALDONADO A.K.A. NANCY
MALDONADO MARQUEZ IN SUPPORT
OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT**

Date: May 29, 2026

Time: 8:30 A.M.

Dept.: S26

Complaint Filed: September 8, 2022

FAC Filed: December 20, 2022

Trial Date: None Set

**DECLARATION OF NANCY MARQUEZ MALDONADO A.K.A. NANCY
MALDONADO MARQUEZ**

I, Nancy Marquez Maldonado A.K.A. Nancy Maldonado Marquez, state and declare as follows:

1. I am a competent adult, over the age of eighteen and the Class Representative Plaintiffs in the matter of NANCY MARQUEZ MALDONADO A.K.A. NANCY MALDONADO MARQUEZ, an individual, on behalf of herself and others similarly situated v. BALDA C. BREWER, INC.; and DOES 1 thru 50, inclusive, San Bernardino County Superior Court, Case No. CIVSB2219827. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto. I am making this sworn declaration in support of my claims and the claim of my co-workers, and in support of my qualifications as Class Representative. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I worked as a production operator for Balda C. Brewer, Inc. (“Defendant” or “Balda Brewer”).

3. In my role as a production operator, I did not receive proper compensation for all wages and/or compensation. I regularly did not receive thirty (30) minute uninterrupted meal periods within the first five (5) hours of my shift when working five hours or more. I also regularly was not provided with ten-minute paid rest periods for every major fraction of four hours that I worked. I did not receive accurate itemized wage statements. Lastly, I did not receive compensation due upon termination of employment.

4. I have spent significant time throughout this class action working with Class Counsel. Before filing this action, on September 8, 2022, I researched and identified Counsel that I believed could best represent the interests of the Class Members. I also assisted the attorneys with investigation and gathering of information including discussing my work experience and the experience of others that I had observed while working for Balda Brewer and provided all relevant employment documents in my possession. In addition, I made myself available for both days of mediation on March 11, 2024 and September 10, 2024. I have actively participated in discussions

1 with the Class Counsel and shared my knowledge and insights in order to help the Class obtain a
2 favorable settlement.

3 5. Though I did not keep contemporaneous time records, I estimate I have spent
4 approximately 20-25 hours on the above activities since 2022.

5 6. Throughout the entirety of this litigation, I have maintained regular contact with
6 Class Counsel and assisted in any way possible by providing information and making myself
7 available as needed.

8 7. I was aware that by helping to initiate this lawsuit, my name would become known
9 and it was possible that my involvement in this matter could make it more difficult for me to obtain
10 employment in this field. Regardless, I believed it was important to proceed with this matter on
11 my behalf and on behalf of all others who were subject to the same problems during their
12 employment with Balda Brewer.

13 8. Based upon my participation in this case, I understand the merits of this settlement
14 and I strongly support the settlement and believe it is fair and reasonable, and in the best interest
15 of the class. I believe this Settlement will benefit the Class.

16 9. It is my opinion that a fair and adequate Class enhancement for me as a Class
17 Representative is \$15,000. I believe that it is fair and reasonable in view of all of the work I have
18 performed in my role as a Class Representative. As Class Representative, I actively participated
19 in all stages of the litigation as detailed above and have always maintained the best interest of the
20 Class while performing my Class Representative duties.

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

23 Executed this 02 day of 09, 2026 at Ontario C.A,
24 California. (City)

25 Nancy M.

26 Nancy Marquez Maldonado a.k.a. Nancy Maldonado
27 Marquez
28 Declarant

(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On April 22, 2026, I served all interested parties in this action the following documents described as: **DECLARATION OF NANCY MARQUEZ MALDONADO A.K.A. NANCY MALDONADO MARQUEZ IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS AND REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

COZEN O'CONNOR

Walter M. Stella
wstella@cozen.com
Brett Greving
bgreving@cozen.com
388 Market Street, Suite 1000
San Francisco, CA 94111
Attorneys for Defendant

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/432>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION) I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 22, 2026, at Chino, California.



Leslie Sanchez