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Attorneys for Plaintiffs,
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SUPERIOR COURT OF CALIFORNIA

COUNTY OF MONTEREY

SIMON EDEZA CAMPANA,
 Plaintiff,

v.

VISTA VERDE LABOR, INC.; and DOES 1
 through 50, inclusive,
 Defendants.

Case No. 23CV000638

**DECLARATION OF PABLO ORTIZ IN
 SUPPORT OF PLAINTIFFS' MOTION
 FOR FINAL APPROVAL OF CLASS
 ACTION SETTLEMENT**

Date: March 13, 2026

Time: 8:30 a.m.

Dept.: 14

I, PABLO ORTIZ declare:

1. I am an individual residing in the city of Monterey, State of California. I am over the age of eighteen (18) and am a Plaintiff in the action titled *Pablo Ortiz Garcia and Carina Merino Ramirez v. Vista Verde Labor, Inc, et al.* filed in the Superior Court of Monterey, Case No. 23CV000632. I hereby submit this declaration in support of my adequacy as a Class Representative and request for the class representative payment.
2. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto.
3. I was employed by Defendant from approximately January 2018 to October 2022 as a farm laborer.
4. I believe that certain employment practices of Defendants were unlawful, including Defendants' practice and policy or procedure violated the Labor Code by failing to pay for all hours worked, including minimum and overtime wages, provide off-duty meal and rest breaks, pay premiums for missed or late meal and rest periods, pay all earned wages when due and upon separation of employment, and provide accurate wage statements and keep accurate records.
5. While I was employed, I was also forced to forego my rest and meal breaks due to Defendants' inadequate staffing and strict performance schedules. Furthermore, I was not compensated for missing my rest and meal breaks.
6. Despite the risks associated with filing a class action lawsuit, I believed that I could adequately represent the proposed class of employees and would prevail on my claims. At the time I agreed to become a class representative, I understood that Defendants directly opposed the merits of the lawsuit and the likelihood that the class would be certified.
7. I believe that I am an adequate class representative because my interests in this action are the same as other employees who worked for Defendants and were not

paid for all time worked. I also believe that I have suffered the same and/or similar violations as many other class members.

8. Throughout this litigation, I have diligently served as a representative of putative employees. I made myself available to my attorneys at their request and conducted several telephone conferences with my attorneys and provided them with a wealth of information about my employment with Defendant. I assisted my attorney with the investigation process by providing documents and gathering information. At the outset of this matter, I spent at least 29 hours speaking with my attorneys regarding the various practices Defendant implemented at their farm.

9. I also helped review documents that Defendant produced in this litigation, assisting my attorneys in understanding various time records and payroll records.

10. I also spoke with my attorneys extensively prior to mediation to help them understand the specific practices Defendant permitted that led me to believe legal violations had occurred.

11. Additionally, on October 25, 2024, I made myself available throughout the entire day to my attorney during the private mediation session with Christopher E. Panetta. In this mediation session where I answered any questions from my attorneys. Over the course of many months of discussions to resolve this matter, I have been in touch with my attorney to discuss the various practices of Defendant and the risks and benefits of litigation on behalf of the class.

12. During the settlement negotiations my attorneys had with Defendant, I understood the risk of moving forward with further litigation as well as a potential trial. Based on the substantial information provided, I believe the pending settlement terms are fair, reasonable and adequate, and the consideration to the proposed class in exchange for a release of claims asserted in the lawsuit is merited.

13. I estimate that I have spent no less than 29 hours total throughout this litigation, including my initial consultations, the numerous meetings with my attorney and

or his co-workers, telephonically, gathering documents, reviewing documents, and attending the mediation session.

14. I spent significant time discussing with my attorneys' various procedures and practices of Defendants.

15. I believe the settlement is fair on behalf of class members. I have been informed that there are no objections to the settlement and 28 opt outs for the case. I believe this shows the class members are in agreement with the settlement and believe it is fair.

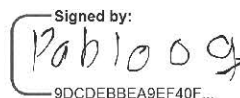
16. I understand that I may be entitled to additional payment for my role as a class representative and the time I spent working on this case. I believe my service payment is warranted as I have had to be patient and diligent during the course of litigation to both pursue and resolve this matter. I also understand that this amount is not guaranteed and is subject to court approval.

17. I also took significant professional risk by agreeing to be a class representative in this case. There is a very real possibility that due to my involvement in this case, other local employers in Monterey County could refuse to hire me.

18. For the reasons stated above, and as an adequate class representative, without any present conflicts, I will request the Court award the service enhancement award \$5,000.00 for my work in this case at the final approval of this matter. This amount is fair and justified because of my extensive involvement and assistance with this litigation, the risks I took by agreeing to be a class representative, and the total settlement fund of \$2,200,000.00.

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

Dated; 2/13/2026, at Monterey, California.

Signed by:

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PABLO ORTIZ