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(SPACE BELOW FOR FILING
STAMP ONLY)

9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF MONTEREY**

12 SIMON EDEZA CAMPANA,
13 Plaintiff,

14 v.

15 VISTA VERDE LABOR, INC.; and DOES 1
through 50, inclusive,
16 Defendants.
17

Case No. 23CV000638

**DECLARATION OF JESUS HUERTA ON
BEHALF OF DEFENDANT VISTA
VERDE LABOR, INC. IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Action Filed: November 9, 2023
Trial Date: None

20
21 I, JESUS HUERTA, do hereby declare:

22 1. I am the HR/Safety Manager of Vista Verde Labor, Inc. ("Vista Verde"). I have
23 worked for Vista Verde in Monterey County, California since August 2022 to the present. I am
24 providing this declaration in support of the Motion for Final Approval of Class Action Settlement.

25 2. My duties as the HR/Safety Manager include archiving, filing, collecting, searching,
26 obtaining, and producing all documents and records related to Vista Verde. I have substantial
27 knowledge as to the location of documents and records within Vista Verde. Accordingly, I function
28 as the custodian of records for Vista Verde.

3. As the HR/Safety Manager, I was asked to provide contact information of the employee class members related to this lawsuit that worked for Vista Verde for at least one day during the period March 2, 2019, through November 4, 2024. I researched and provided all the contact information and workweeks worked that I could; however, I did not have contact information for several employees (hereinafter referred to as the "Unfound Employees"). These Unfound Employees most likely only worked for a very short time (i.e., one or two days) and then quit without submitting all their onboarding paperwork. The Unfound Employees' names were written down by a foreman with an internal employee identification number assigned but lacked any other contact or personal identifying information.

4. To attempt to find any of these Unfound Employees, I was asked to post their names throughout the break areas of Vista Verde work locations with a contact number for them to call regarding the settlement in this case (hereinafter referred to as the "Notice"). Attached hereto as **Exhibit A** is a true and correct copy of the Notice I had posted. Between January 2, 2026, until the present, I had Vista Verde supervisors post the Notice with the set list of Unfound Employees to locate them. I had the Notice placed around the break areas and restrooms where the employees frequented often throughout the day. I estimate that the Notice was posted (and continues to be posted) at approximately over 40 different locations throughout the work areas.

I know the above from my own personal knowledge and could competently testify thereto in a court of law. I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct and that this declaration was executed by me on February 18, 2026, at Salinas, California.

By: Jesus Huerta

EXHIBIT A

 CLASS ACTION SETTLEMENT NOTICE | **AVISO DE ACUERDO COLECTIVO**

Vista Verde Labor, Inc. is looking for the following individuals who may qualify to be a part of a class settlement. If your name is listed below, please contact Jarrod Salinas with Phoenix Group at (949) 344-8851 for further details:

Vista Verde Labor, Inc. está buscando a las siguientes personas que pueden calificar para ser parte de un acuerdo colectivo. Si su nombre aparece en la lista a continuación, por favor comuníquese con Jarrod Salinas en Phoenix Group at (949) 344-8851 para más detalles.

ID	Employee Name	ID	Employee Name	ID	Employee Name
16294	[REDACTED]	33867	[REDACTED]	26199	[REDACTED]
32044	[REDACTED]	29411	[REDACTED]	24216	[REDACTED]
22322	[REDACTED]	18762	[REDACTED]	24254	[REDACTED]
33605	[REDACTED]	26751	[REDACTED]	23477	[REDACTED]
29474	[REDACTED]	19670	[REDACTED]	33218	[REDACTED]
10604	[REDACTED]	33208	[REDACTED]	21096	[REDACTED]
21342	[REDACTED]	29084	[REDACTED]	27329	[REDACTED]
31172	[REDACTED]	21653	[REDACTED]	27334	[REDACTED] an
23390	[REDACTED]	29503	[REDACTED]	22464	[REDACTED]
26368	[REDACTED]	21638	[REDACTED]	20707	[REDACTED]
32057	[REDACTED]	29085	[REDACTED]	22471	[REDACTED]
28820	[REDACTED]	28063	[REDACTED]	30209	[REDACTED]
22661	[REDACTED]	26708	[REDACTED]	24262	[REDACTED]
30879	[REDACTED]	33952	[REDACTED]	33017	[REDACTED]
28187	[REDACTED]	13566	[REDACTED]	22845	[REDACTED]
33441	[REDACTED]	26709	[REDACTED]	22979	[REDACTED]
23285	[REDACTED]	25080	[REDACTED]	29696	[REDACTED]
22608	[REDACTED]	21940	[REDACTED]	32401	[REDACTED]
34002	[REDACTED]	21171	[REDACTED]	24000	[REDACTED]
31113	[REDACTED]	27613	[REDACTED]	23956	[REDACTED]
32979	[REDACTED]	27026	[REDACTED]	21438	[REDACTED]
30603	[REDACTED]	22649	[REDACTED]	32841	[REDACTED]
29475	[REDACTED]	28542	[REDACTED]	24217	[REDACTED]
23999	[REDACTED]	23767	[REDACTED]	26370	[REDACTED]
29001	[REDACTED]	29777	[REDACTED]	26367	[REDACTED]
18693	[REDACTED]	33260	[REDACTED]	28574	[REDACTED]
34244	[REDACTED]	27344	[REDACTED]	33029	[REDACTED]
21269	[REDACTED]	22507	[REDACTED]	30213	[REDACTED]
26111	[REDACTED]	21692	[REDACTED]	34146	[REDACTED]
26773	[REDACTED]	27483	[REDACTED]	29287	[REDACTED]
28487	[REDACTED]	21589	[REDACTED]	30351	[REDACTED]
22397	[REDACTED]	29781	[REDACTED]	22909	[REDACTED]
21069	[REDACTED]	29227	[REDACTED]	31157	[REDACTED]
29921	[REDACTED]	32336	[REDACTED]	16939	[REDACTED]
29406	[REDACTED]	18043	[REDACTED]	21611	[REDACTED]
27974	[REDACTED]	27134	[REDACTED]	24282	[REDACTED]
20828	[REDACTED]	24960	[REDACTED]	5072	[REDACTED]
27864	[REDACTED]	27910	[REDACTED]	27068	[REDACTED]
34079	[REDACTED]	29536	[REDACTED]	24231	[REDACTED]
26369	[REDACTED]	32410	[REDACTED]	32393	[REDACTED]
29162	[REDACTED]	26476	[REDACTED]	26448	[REDACTED]
33662	[REDACTED]	24793	[REDACTED]	24683	[REDACTED]
20752	[REDACTED]	18942	[REDACTED]	23959	[REDACTED]

29308		22487		33256	
21274		30901		33950	
21370		27969		27360	
32886		28788		22958	
27322		30534		32796	
23023		28032		27437	
21507		31733		20833	
33348		32203		30225	
25245		28859		22211	
10741		34114		22862	
29855		27465		21577	
992		30168		26482	
25865		22101		27854	
22455		29263		23349	
20608		21405		32386	
30141		30719		28589	
11423		29477		21622	
21417		27550		27821	
24174		22790		20607	
18244		27010		21259	
20569		30864		22212	
16325		32041		25211	
27577		25332		27100	
31471		20496		32003	
25609		20504		30952	
26994		27350		29118	
26452		31993		23358	
22656		23017		27062	
27466		31998		20430	
20091		21682		33261	
30212		25334		26406	
21990		18968		33835	
23773		33804		20606	
24497		14587		31651	
23820		14991		24795	
12165		21251		22662	
24591		31098		21429	
25537		21669		26196	
25454		23118		30379	
34234		28579		25949	
29478		26082		20712	
27084		31099		32856	
21650		22457		20370	
27038		26491		22616	
13042		32332		32024	
21736		22843		13567	
28361		33442		28333	
26401		30259		32819	
29715		29791		25778	
21202		27433		26365	
33215		29581		32805	
26127		24965		17064	
26817		22797		33176	
21685		24540		19139	
22348		24364		24593	
30533		26056		24428	
32033		15205		21095	
30856		22624		24270	

21279		21452		29113	
23036		21691		23633	
33857		28077		34257	
30488		27185		34014	
31101		27101		32025	
33216		31023		22609	
27347		27146		25593	
28313		30860		24686	
29409		30445		25162	
20570		25240		24942	
24638		28573		27851	
33271		22660		29436	
33858		21349		23497	
28072		33381		33482	
29268		22886		29471	
18144		24185		27817	
21725		19296		33938	
21678		23605		31464	
25174		27970		26490	
21711		21672		33211	
29580		22436		23279	
23649		32408		27894	
23281		28745		22431	
33512		26364		26072	
11425		23765		22851	
27471		20855		30345	
33598		29426		33210	
23241		24222		25237	
27265		27451		31632	
22977		29180		31669	
27452		20451		25721	
21631		26466		22417	
25251		29513		29365	
28767		21627		21662	
32547		25586		33057	
23624		24716		27947	
21992		28296		21510	
25025		33518		32519	
27420		27008		32535	
23121		26481		22571	
24600		23990		29938	
16261		31033		34105	
22069		22469		21258	
25634		21702		24975	
12546		25191		21614	
33344		22863		28350	
23019		22832		27793	
29472		33095		21712	
26471		25550		32303	
26121		23417		24446	
29706		20450		32844	
30428		33508		28297	
23627		22668		25186	
28364		28603		32008	
19291		30850		25926	
32765		27061		31039	
30972		27094		20633	
12838		33214		24604	

21660		33562		23459	
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28362		30548		24351	
28787		30690		14827	
20439		22885		24246	
31633		23955		30984	
19898		27813		20873	
28765		21327		31631	
24109		30638		22889	
21521		22837		33125	
27399		30055		25117	
33753		33748		20375	
32502		29470		20383	
30934		20556		23957	
17582		24218		29363	
20805		25037		29547	
32799		29061		27564	
21127		20452		24855	
26625		12217		22509	
21939		26606		21105	
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22841		33467		27338	
32846		30170		23958	
33233		30601		22591	
31812		27025		31935	
32466		32394		33603	
20572		21126		29163	
27266		34049		18502	
23119		34516		21110	
23481		34515		26619	
27880		28760		25633	
22587		24681		24826	
32879		21145		20792	
25182		22855		21668	
31629		24299		33354	
24685		25587		27090	
29143		30210		33339	
25187		22770		29520	
27011		30967		25185	
29345		28789		21403	
24031		27345		33425	
32032		27858		29467	
26792		23772		26864	
21143		22632		27398	
27638		26518		28268	
25585		8611		22611	
22887		21158		25212	
27033		21092		25603	
20702		19643		30371	