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Attorneys for Plaintiff Jose Alvarado aka Jose Alverto Alvarado Rivera

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF FRESNO

JORGE ALCALA, an individual, and JOSE
ALVARADO aka JOSE ALBERTO
ALVARADO RIVERA, individually, and on
behalf of themselves, the State of California, as
private attorneys general, and on behalf of all
others similarly situated,

Plaintiffs,

vs.

CERTIFIED MEAT PRODUCTS, INC., a
California Corporation; and DOES 1 TO 50,
inclusive,

Defendants.

Case No.: 22CECG03628

[Hon. Lisa M. Gamoian]

CLASS ACTION

**DECLARATION OF JOSE ALVARADO
REGARDING MOTIONS FOR APPROVAL
OF CLASS ACTION SETTLEMENT**

Date: October 1, 2025

Time: 3:30 p.m.

Courtroom: 403

Judge: Hon. Lisa M. Gamoian

Action Filed: November 14, 2022

Trial Date: Not Set

DECLARATION OF JOSE ALVARADO

I, JOSE ALVARADO aka JOSE ALBERTO ALVARADO RIVERA, declare as follows:

1. I am a named Plaintiff in this case. I am a former employee of the named defendant, CERTIFIED MEAT PRODUCTS, INC. ("Defendant"). As such, I have personal knowledge of, or am informed and believe, the following facts herein stated. If called as a witness. I could and would testify competently to the following:

JOB DUTIES AND EXPERIENCES

2. I worked for Defendant during the Settlement Class Period. My employment began in about 2010 and ended on or about April 2022. I held the job position of Meat Processor, one of the positions that is at issue in this case and included within the class.

3. My job duties included processing uncut meat for cleaning, trimming, and eventual packing and delivery.

4. Among other problems, I experienced off-the-clock work waiting in long lines to clock in for my shift, short meal periods, missed third rest breaks, and unreimbursed expenses for knife sharpening. As a result of these issues, I did not receive all wages when due and my wage statements were not always accurate.

DUTIES OF A CLASS REPRESENTATIVE

5. This lawsuit is not an individual lawsuit. It is a proposed class action. I understand that, if approved as a class representative in this matter, I have an obligation to do my best to look out for the interests of other class members, the current and former employees of Defendant who I am seeking to represent. I understand that my obligations to the class exist even when the class is certified solely as part of a class action settlement. It is my understanding that, as one part of this duty to the class, I cannot agree to a settlement to benefit myself to the exclusion of the rest of the class members. I have never asked my attorneys to simply settle this matter at any cost. Rather, I have asked them to obtain the best settlement they could within reason, and I believe that they have attempted to do so.

6. This case was filed two years ago, and I understand that it will continue for about one more year, even if the proposed settlement is approved. I have never asked to be relieved from my role as a proposed class representative. To the contrary, I have made myself available whenever my attorneys wanted to discuss aspects of my employment by Defendant, and I remain committed to seeing this matter through to the end.

7. I have conferred with my attorneys about the settlement proposed in this case. I am not an accountant, but I understand the factors and risks that need to be considered when evaluating a settlement.

8. Summing it all up in the simplest terms, I am asking to be stand-in for other employees of Defendant. Because of that, I cannot quit on the Class, and I cannot put myself and my interests before the Class. I accept these duties and request that I be approved as the class representative for purposes of this amended Settlement.

COMMUNITY OF INTEREST: TYPICALITY AND ADEQUACY

9. I was an hourly non-exempt employee of Defendant and was subject to the same pay structure and rules as all the other hourly non-exempt employees of Defendant.

10. I am not aware of anything special about me that would raise unique defenses to my claims, as opposed to the claims of the class. I am also not suing for anything unique to me. Rather, my claims are based upon the same facts that relate to the rest of the Class.

11. I do not believe that I have any conflicts with Class Members included in this proposed Settlement. I do not have any intention to take any action that would place me in a position that is hostile to other Class Members.

SERVICE AS A CLASS REPRESENTATIVE

12. I believe that were it not for my stepping forward and taking on the duties of protecting the interests of other Defendant employees, it is likely that the interests of the class would neither have been prosecuted, nor benefited. To my knowledge, other than this lawsuit and my original lawsuit that was added to this matter, there is no other litigation, on a class or individual basis, concerning the

claims in this lawsuit.

13. I have assumed some long-lasting risk in prosecuting this case. Because it is so easy to search for information online these days, I will face an increased risk that future employers will discover information about this lawsuit online and have a negative reaction to learning that I sued an employer. This may make it harder for me to obtain future employment or change jobs for a better opportunity.

14. I have devoted a substantial amount of my time, both before this lawsuit was filed and also during its litigation to ensure a fair result for the employee class. This involved ongoing communications and participation with my counsel during the course of this case. I spent about four hours searching for attorneys who focused on employment issues.

15. My participation began with bringing certain issues that are involved in this matter to my counsel's attention, and explaining the factual background that was used to prosecute the claims in this case. The intake process, spread over several long telephone conferences, took about three hours in total.

16. For example, I reviewed documents which I already had, I provided relevant documents to my counsel, and I explained those documents and related facts to my counsel to assist them in their review. I also assisted in identifying potential witnesses, including other employees, who might likewise have been of assistance. After I hired my attorneys, the search for documents and the initial discussions with my attorneys to provide them with information took about three hours in total.

17. My efforts continued after suit was filed. For example, I continued to identify employees and other witnesses to counsel, along with other information as to how they could be of potential use in this matter. I also discussed strategy with my counsel. At other times I called my attorneys to receive updates about the progress of the case. All of my follow-up calls with my lawyers took about three hours in total.

18. I also made myself available to answer any questions that arose during the full day mediation.

19. After the mediation, a short version of the settlement was prepared, which was called a memorandum of understanding. I reviewed that agreement with my attorneys. Later, a long-form

settlement agreement was negotiated, and I reviewed it with my attorneys as well as I was able to ensure that its terms are likewise fair and adequate. The settlement agreement is long and complicated. It took me more than an hour to read the long-form settlement agreement. I then spoke with my attorneys about the Settlement. Overall, the process of reviewing the written terms of the Settlement took about four hours.

20. In sum, including all other time not summarized above, I believe I have provided well over 18 hours of my time during the course of this litigation to ensure a good outcome for the best interests of the class.

21. I do not believe that I have any conflicts with Class Members included in this proposed Settlement.

22. I have no relationship with the Administrator selected to administer this proposed Settlement.

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

Executed on 2/26/2025, in California.

Firmado por:

Jose Alvarado

JOSE ALVARADO aka JOSE ALBERTO
ALVARADO RIVERA, "Declarant"