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Attorneys for Plaintiff & Putative Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KINGS
(UNLIMITED JURISDICTION)

JUAN C. SOLANO, on behalf of himself and
others similarly situated,

Plaintiff,

vs.

DAVID BAKKER DAIRIES; DAVID
BAKKER, individually; JOSEPH BAKKER,
individually; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 23C-0048

**DECLARATION OF JUAN C. SOLANO
IN SUPPORT OF MOTION FOR (1)
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT;
(2) PROVISIONAL CERTIFICATION OF
CLASS AND APPOINTMENT OF CLASS
COUNSEL; (3) APPROVAL OF FORM
AND METHOD OF CLASS NOTICE;
AND (4) THE SCHEDULING OF A
FINAL FAIRNESS HEARING**

Hon. Robert Shane Burns

Date: January 14, 2025

Time: 08:15 a.m.

Dept: 2

1 I, Juan C. Solano, make the following statements based on my personal knowledge:

2 1. I am the Plaintiff in this case. I filed this lawsuit on behalf of myself and co-workers
3 employed by David Bakker Dairies dba Countryside Dairy, David Bakker, and Joseph Bakker
4 (“Defendants”). I allege that we were not paid for all our overtime wages, meal break premiums,
5 rest break premiums, we were not reimbursed for work boots and aprons that were necessary to do
6 our jobs, and other causes of action.

7 2. I worked for Defendants from approximately November 2021 to November 2022 as
8 a milker. As a milker, my co-workers and I had to milk thousands of cows.

9 3. I had my first conversation with attorney Enrique Martinez in November 2022, after
10 I was fired from my job. We talked about Countryside’s practice of not giving workers lunches on
11 time and adequate breaks. I also shared what I knew about how other workers were treated by
12 Defendants since I had been there longer than other employees.

13 4. I met with Mr. Martinez within a couple of weeks from our first discussion.
14 Attorney Martinez explained my legal options, and my understanding was that if I pursued the case
15 individually, it would likely get resolved sooner. I decided to file the case as a class action because
16 I believed the company was violating the rights of all the workers, and not only my rights. I wanted
17 to help improve the working conditions for the dairy workers at Countryside Dairy.

18 5. I understood there were risks involved in a class action lawsuit, including the
19 possibility that some workers would not support the case. I decided to go forward as a class despite
20 not knowing how long the lawsuit could go on. I accepted the risk that I might be responsible for
21 some or all of Countryside Dairy’s legal costs in this matter if we did not settle or win our case. I
22 also feared I would be blacklisted from future jobs, which could hurt my family and me because
23 the dairy industry is small and well connected.

24 6. As a class representative, I have been very active in the case and the process. I have
25 responded to many calls from Attorney Martinez’s staff, in which we have gone over the strategies
26 and Countryside Dairy’s practices to build up the case. I met with Attorney Martinez to prepare for
27 discovery and mediation. I also provided him with documents regarding my pay and hours
28 worked. I also traveled from Corcoran to Visalia on June 4, 2024 to participate in mediation. I feel

1 that my participation contributed to getting the case resolved.

2 7. I have encouraged my co-workers to attend the meetings with Mr. Martinez. As
3 class representative, I worked hard to make sure other workers participated in the lawsuit and
4 authorized the release of their time and pay records. I continue contributing to the case by making
5 sure people were aware of the status of the litigation.

6 8. Regarding the proposed *cy pres* recipient, Community Services Employment
7 Training (CSET)-Family Resources Centers, I have never been involved with CSET in any way,
8 including its governance and work.

9 9. As part of the Settlement Agreement, I agreed to sign a general release with a
10 California Civil Code Section 1542 waiver of any and all claims I might have against the
11 Defendants.

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

14 Executed this December 5, 2024 in Corcoran, California

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16 By: 
17 _____
18 Juan C. Solano
19 Plaintiff
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TRANSLATOR AFFIDAVIT

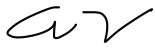
1. My name is Alma Villalobos. My place of employment is 333 Hegenberger Road, Suite 500, Oakland, CA 94621.

2. I hereby certify that I translated the Declaration of Juan C. Solano In Support of Motion For (1) Preliminary Approval of Class Action Settlement; (2) Provisional Certification of Class and Appointment of Class Counsel; (3) Approval of Form and Method of Class Notice; and (4) The Scheduling of a Final Fairness Hearing.

3. I further certify that I am competent in both Spanish and English to render and certify such translation.

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

Execute to December 5, 2024 in Oakland, California.



Alma Villalobos

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Case No. 23C-0048

**DECLARATION IN SPANISH OF JUAN
C. SOLANO IN SUPPORT OF MOTION
FOR (1) PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT;
(2) PROVISIONAL CERTIFICATION OF
CLASS AND APPOINTMENT OF CLASS
COUNSEL; (3) APPROVAL OF FORM
AND METHOD OF CLASS NOTICE;
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FINAL FAIRNESS HEARING**

Hon. Robert Shane Burns

Date: January 14, 2025

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1 I, Juan C. Solano, make the following statements based on my personal knowledge:

2 1. Yo soy el demandante en este caso. Presenté esta demanda en mi nombre y en el de
3 mis compañeros de trabajo empleados por David Bakker Dairies dba Countryside Dairy, David
4 Bakker y Joseph Bakker ("Demandados"). Alego que no se nos pagó todas las horas extras que
5 trabajamos, primas del almuerzo, primas del descanso, no se nos reembolsó por las botas de trabajo
6 y mandiles que eran necesarios para hacer nuestro trabajo, y otras causas de acción.

7 2. Yo trabajé para los Demandados desde aproximadamente noviembre 2021 hasta
8 noviembre 2022 como ordeñador. Como ordeñador, mis compañeros y yo teníamos que ordeñar
9 miles de vacas.

10 3. Tuve mi primera conversación con el abogado Enrique Martínez en noviembre
11 2022, después de que me despidieran de mi trabajo. Hablamos de la práctica de Countryside de no
12 dar a los trabajadores almuerzos a tiempo y descansos adecuados. También compartí lo que sabía
13 sobre cómo los Demandados trataban a otros trabajadores, porque yo había estado allí más tiempo
14 que otros empleados.

15 4. Me reuní con el Sr. Martínez un par de semanas después de nuestra primera
16 conversación. El abogado Martínez me explicó mis opciones legales, y entendí que, si seguía el
17 caso individualmente, probablemente se resolvería antes. Yo decidí presentar el caso como una
18 demanda colectiva porque creía que la lechería estaba violando los derechos de todos los
19 trabajadores, y no solo los míos. Yo quería ayudar a mejorar las condiciones de trabajo de los
20 trabajadores de la lechería Countryside Dairy.

21 5. Entendí que había riesgos involucrados en una demanda colectiva, incluso la
22 posibilidad de que algunos trabajadores no apoyaran al caso. Yo decidí seguir adelante como
23 demanda colectiva a pesar de no saber cuánto tiempo podría durar la demanda. Acepté el riesgo de
24 que podría ser responsable de algunos o todos los costos legales de Countryside Dairy en este caso
25 si no llegamos a un acuerdo o no ganamos nuestro caso. También temía que me pusieran en la lista
26 negra de trabajos futuros, lo que podría perjudicar a mi familia y a mí porque la industria de
27 lecherías es pequeña y está bien conectada.

6. Como representante de la clase, yo he estado muy activo en el caso y en el proceso. He respondido a muchas llamadas de los trabajadores del abogado Martínez, en las que hemos repasado las estrategias y las prácticas de Countryside Dairy para construir el caso. Me reuní con el abogado Martínez para prepararme para el descubrimiento y la conciliación. También le proporcioné documentos sobre mi salario y las horas trabajadas. También viajé de Corcoran a Visalia el 4 de junio de 2024 para participar en la conciliación. Siento que mi participación contribuyó a que se resolviera el caso.

7. He animado a mis compañeros de trabajo a asistir a las reuniones con el Sr. Martínez. Como representante de la clase, trabajé duro para asegurarme de que otros trabajadores participaran en la demanda y autorizaran la divulgación de sus registros de tiempo y pago. Continúo contribuyendo al caso asegurándome de que las personas estén al tanto del estado del caso.

8. Con respecto al destinatario propuesto de *cy pres*, Community Services Employment Training (CSET)-Family Resources Centers, yo nunca he estado involucrado con CSET de ninguna manera, incluyendo su gobernanza y trabajo.

9. Como parte del Acuerdo de Conciliación, yo acepte firmar una liberación general con una renuncia de la Sección 1542 del California Civil Code a todas y cada una de las reclamaciones que pudiera tener contra los Demandados.

Declaro bajo pena de perjurio bajo las leyes del estado de California y de los Estados Unidos que lo antes mencionado es verídico y correcto.

Firmado este 5 de diciembre de 2024 en Corcoran, California.

Por: 
Juan C. Solano
Demandante