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13 *Attorneys for Plaintiffs & Putative Class*

14
15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16
17 **FOR THE COUNTY OF TULARE**
18
19 **(UNLIMITED JURISDICTION)**

20 MAYNOR HERRERA, RODRIGO RUIZ
21 GARCIA, and PEDRO CORONA on behalf
22 of themselves and others similarly situated,

23 Plaintiffs,

24 vs.

25 JAMES JONGSMA DAIRY; JESSE &
26 JAMES JONGSMA DAIRY G.P. a general
27 partnership; JAMES JONGSMA,
28 individually; JESSE JONGSMA, individually;
and DOES 1 through 50, inclusive,

Defendants.

Case No. VCU296028

Hon. Bret Hillman

**DECLARATION OF PLAINTIFF
PEDRO CORONA IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: September 24, 2024

Time: 8:15 a.m.

Dept: 2

I, Pedro Corona, make the following statement based on my personal knowledge:

1. I am one of the Plaintiffs of this case. I filed this lawsuit on behalf of myself and co-workers employed by James Jongsma Dairy; Jesse & James Jongsma Dairy G.P., a general partnership; James Jongsma; and Jesse Jongsma (collectively as "Defendants"). We allege that we were not paid for all our overtime wages, meal break premiums, rest break premiums, were not reimbursed for work boots that were necessary to do our jobs and other causes of action.

1 2. I worked for Defendants from approximately 2018 to April 2024. I worked as an
2 outside worker for James Jongsma Dairy.

3 3. I typically worked shifts over 9.5 hours. I often took my lunch after having worked
4 more than five hours. We were also not authorized to take 10-minute uninterrupted rest breaks
5 because the work had to be done and we had to complete it before finishing our shift. I also bought
6 rubber boots to protect myself from any injuries or health hazards on the job such as getting
7 excessive water or chemicals on my feet.

8 4. I first spoke with attorney Enrique Martinez in August 2022. We talked about
9 Defendants' practices of not giving workers lunches on time and no breaks, and of not paying us
10 premiums for these violations. I also shared what I knew about how other workers were treated by
11 Defendants.

12 5. I met with attorney Martinez and other co-workers within several weeks of our first
13 discussion. He explained our legal options and my understanding was that if I pursued the case
14 with only a few co-workers, it would likely get resolved sooner. I decided to file the case as a class
15 action, and not individually, because I believed the company was violating the rights of all the
16 workers, and not only my rights. I wanted to help improve the working conditions for the dairy
17 workers laboring at Defendants' dairy.

18 6. I understood there were risks involved in a class action lawsuit, including the
19 possibility of losing my job, since I was still employed with Defendants throughout most of the
20 litigation process. However, I still decided to go forward as a class despite not knowing how long
21 the lawsuit could go on. We were interested in moving forward together to have a greater impact
22 on our working conditions. I accepted the risk that I might be responsible for some or all of
23 Defendants' legal costs in this matter if we did not settle or win our case. I also feared I would be
24 blacklisted from not only Defendants' Dairy but also future jobs, which could hurt me because the
25 dairy industry is small and people know each other.

26 7. As a class representative, I have been very active in the case and the process. I
27 responded to many calls from the office Attorney Martinez, in which we have gone over the
28 strategies and Defendants' policies to build up the case. I met with him on a number of occasions

1 to prepare for discovery and mediation. I also provided him with many documents regarding my
2 hours worked, which strongly supported the case. I also traveled from Pixley to Visalia on
3 December 7, 2023 to participate in mediation with the Defendants. I feel that my participation
4 contributed to getting the case resolved.

5 8. I encouraged my co-workers to attend the meetings with Mr. Martinez. As class
6 representative, I worked hard to make sure other workers attended our meetings and participated in
7 the lawsuit. I continue contributing to the case by making sure people are aware of the status of the
8 litigation.

9 9. Regarding the proposed *cy pres* recipient, Visalia Rescue Mission, I have never been
10 involved with Visalia Rescue Mission in any way, including its governance and work.

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

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

16 Executed this August 27, 2024 in Pixley, California

17 By: Pedro Corona
18 Pedro Corona
19 Plaintiff
20

21 I, Alma Villalobos, am fluent in English and in Spanish. On August 26, 2024, I read the
22 foregoing to Pedro Corona by accurately translating it from English to Spanish.

23 I declare under penalty of perjury that the foregoing is true and correct. Executed on
24 August 27, 2024 at Oakland, California.

25 Alma Villalobos
26 Alma Villalobos
27
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