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10 Attorneys for Plaintiff JUAN ANTONIO JUAREZ-NARANJO

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **FOR THE COUNTY OF MONTEREY**

13 **(UNLIMITED JURISDICTION)**

14 JUAN ANTONIO JUAREZ-NARANJO,

Case No.: 23CV001428

15 *Plaintiff,*

16 **DECLARATION OF JUAN ANTONIO**
17 **JUAREZ-NARANJO IN SUPPORT OF**
18 **PLAINTIFF'S MOTION FOR APPROVAL**
19 **OF PAGA SETTLEMENT**

20 vs.

21 SUR AT THE BARNYARD, INC.;

22 ASHLEY DUDLEY; and DOES 1 to 25,

23 inclusive,

Action filed: May 4, 2023

Hearing Date: September 12, 2025

Hearing Time: 8:30 a.m.

Hearing Dept: 14, Hon. Carrie M. Panetta

24 *Defendants.*

DECLARATION OF JUAN ANTONIO JUAREZ-NARANJO IN SUPPORT OF
PAGA SETTLEMENT AND RELEASE

I, JUAN ANTONIO JUAREZ-NARANJO, declare and state as follows:

1. I am a resident of the State of California and am over 18 years of age. I am the named Plaintiff in this action and am represented by Harout Messrelian of Messrelian Law, Inc. in this action. Except as otherwise stated, I have personal knowledge of all matters set forth in this declaration and could and would competently testify thereto if called upon to do so as a witness.

2. I first started working for Defendants in or around January 2019 as a cook and a chef. My employment with Defendants ended on or around January 1, 2023.

3. I understand that I am the Plaintiff and that SUR AT THE BARNYARD, INC. and DUDLEY ASHLEY (collectively "SUR AT THE BARNYARD") are the Defendants. I understand that my name is on the cover of the lawsuit. I understand that I am the representative of other SUR AT THE BARNYARD employees. As the representative in this lawsuit, I have duties to the State of California and other employees like me who were not paid for all hours worked at the correct rates of pay, provided all required meal and rest periods, and reimbursed for necessary business expenses, such as personal mobile phones and uniforms/kitchen tools and equipment. I also understand that my lawsuit is on behalf of the State of California. I have fairly represented the other employees and the State throughout this lawsuit. I don't have any disagreements with the other SUR AT THE BARNYARD employees I represent. I am not aware of any reason why I can't make the best decisions for them in this lawsuit.

4. When I agreed to hire my attorneys to file this lawsuit, I also agreed that I would be the representative of the other employees and the State of California. I agreed that the interests of the other employees and the State in the lawsuit are as important as my personal interests in suing SUR AT THE BARNYARD. I agreed that I would do what is in the best interest of the other employees and the State when deciding whether or not to settle this lawsuit. I also agreed to actively participate in the lawsuit. I also understand that there will only be a settlement of the lawsuit if the Court allows it.

5. The PAGA statute does not forbid service awards. Courts frequently award them in PAGA-only cases as well. The work I have done on this case includes hiring my attorneys, speaking with my attorneys on many occasions by phone, explaining what my employment at

1 SUR AT THE BARNYARD was like, explaining what my employment at SUR AT THE
2 BARNYARD had in common with other employees who worked for SUR AT THE
3 BARNYARD, explaining my claims to my attorneys, and communicating with my attorneys
4 about the settlement agreement and related documents. Despite this, I am **not** asking for a service
award for my involvement and the time I spent assisting my counsel with the PAGA action.

5 6. I negotiated an individual settlement of my disability discrimination, retaliation,
6 and wrongful termination claims after the Parties had agreed to the Settlement of the PAGA
7 action.

8 7. As part of my individual settlement, I signed a general release of all claims,
9 whether known or unknown, that I may have against Defendant, not only PAGA claims.

10 8. I don't believe that my individual settlement has any bearing on whether I have
11 served the Aggrieved Employees' best interests and will continue to do so. Nevertheless, I am
12 willing to provide it to the Court *in camera* if the Court so requests.

13 I declare under the penalty of perjury of the laws of the State of California that the
14 foregoing is true and correct to the best of my knowledge.

15 Executed on 08/04/2025 at Seaside, California.

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Juan Antonio juarez naranjo (Aug 4, 2025 14:51:04 PDT)

17 JUAN ANTONIO JUAREZ-
18 NARANJO,
19 Declarant
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