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9 Attorneys for Plaintiff

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF MONTEREY**

12 JASMIN JIMENEZ, on behalf of herself and all
similarly aggrieved employees,

13 Plaintiff,

14 vs.

15 SEA HOUSE SALINAS, LLC; OMAR
16 CAMPOS; SHAN BAO GUO; BAG O'CRAB,
INC.; SEA HOUSE SL LLC; BAG O CRAB MC
17 LLC; and DOES 3 through 50, inclusive,

18 Defendants.

Case No. 23CV000504

[Assigned to Hon. Thomas W. Wills, Dept. 15]

**DECLARATION OF ALISON L. BAKER IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: June 27, 2025
Time: 8:30 a.m.
Department: 15

Complaint Filed: February 16, 2023
FAC Filed: June 5, 2023
SAC Filed: November 8, 2024

1 I, Alison L. Baker, hereby declare and state as follows:

2 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
3 California, and I am an associate with the law firm Fitzpatrick & Swanston, counsel of record for
4 Plaintiff Jasmin Jimenez ("Plaintiff"). I have personal knowledge of the facts set forth below and if
5 called to testify I could and would do so competently.

6 2. I am one of the primary attorneys on this matter. I have spent significant time pursuing
7 the claims that have been alleged in this action. From the inception of the case, I have zealously
8 represented the interests of the Plaintiff and the putative Class.

9 3. I do not have a conflict of interest with Plaintiff or the Class Members.

10 4. Neither counsel nor their respective firms have any relationship with the proposed *cy pres*
11 recipient that would create an actual or potential conflict of interest. Defense counsel and I further agree
12 that Legal Aid at Work satisfies the legislative intent set out in Code of Civil Procedure § 384(a).

13 5. My qualifications are as follows: I was awarded my bachelor's degree from the
14 University of California, Davis, with Honors, including a one-year study abroad program at La
15 Universidad Complutense, in Madrid, Spain. I received my Juris Doctorate degree from Santa Clara
16 University School of Law, where I earned a certificate of Public Interest Law, worked as a judicial
17 extern in the United States Northern District Court, volunteered at the East San Jose Community Law
18 Center Worker's Rights Clinic, and argued motions in Court as a Certified Law Student at the Santa
19 Clara County Public Defender's Office. I was admitted to the State Bar in December 1997 and started
20 as an associate attorney at the Law Offices of Vincent P. Hurley in Salinas, CA; an AV rated civil
21 litigation practice serving as outside litigation counsel to public entities as defense counsel, including
22 many employment law matters. I assisted in discovery, motions, and all aspects of trial preparation, and
23 wrote winning summary judgment motions on behalf of San Benito County and Monterey County.

24 6. In the year 2000, I changed my practice focus to plaintiff's-side litigation and I joined the
25 National Association of Consumer Advocates. From 2000-2008, I focused on consumer protection and
26 public interest cases, including many consumer class actions and representative actions. While
27 employed with the law firm Kemnitzer, Anderson, Barron & Ogilvie in San Francisco, CA, I acted as
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1 lead trial counsel in civil jury and bench trials and successfully resolved representative consumer actions
2 and obtained injunctions on behalf of thousands of Californians. My work emphasized Spanish-
3 language protections in consumer financing, redressing fraud and misrepresentations in auto sales and
4 leasing, and challenging unfair debt collection practices and unfair/unlawful credit reporting.

5 7. From 2008 through 2018, I had the honor of joining the Superior Court of California,
6 County of Santa Cruz, as a Judicial Attorney. I served as a Staff Attorney, Civil and Small Claims
7 Advisor at the Court's Self-Help Center and Office of the Family Law Facilitator. My employment law
8 work there involved advising self-represented litigants in termination, discrimination, and wage & hour
9 cases in Small Claims Court, and in enforcing judgments filed by the Labor Commissioner.

10 8. From 2018 through October 2022, I practiced employment and consumer protection
11 litigation at the Watsonville Law Center in Watsonville, California. As the Director of Litigation, I
12 focused on using civil litigation to achieve justice for poor and vulnerable communities in the areas of
13 employment, housing and consumer rights. I participated in the law center's employment law clinics,
14 and I represented clients in the Superior and Federal Courts, Arbitrations, and administrative
15 proceedings before the Labor Commissioner.

16 9. In October 2022, I joined the law firm Fitzpatrick & Swanston, where my practice
17 focuses on employment matters involving both class actions and single plaintiffs. The firm has handled
18 hundreds of wage and hour cases to conclusion and has been class counsel and/or co-counsel in over 100
19 class actions. I am currently handling, or have handled, numerous wage and hour class action lawsuits,
20 including but not limited to *Aquino (Reyes) v. Coast King Packing, LLC* (Monterey County Case No.
21 21CV002448); *Arrellano v. Rocha Brothers Farms, LLC* (Santa Cruz County Case No. 21CV01286);
22 *Aguas v. Coast 2 Coast Coaching Inc.* (Monterey County Case No. 23CV001404); *Bravo v. Mann*
23 *Packing Co. Inc.* (Monterey County Case No. 23CV002342); *Campana v. Vista Verde Labor, Inc.*
24 (Monterey County Case No. 23CV000638); *Hernandez v. Pro Ag Harvesting* (Monterey County Case
25 No. 23CV000826); *Jimenez v. Sea House Salinas, LLC* (Monterey County Case No. 23CV000504;
26 *Mendoza v. Care From the Heart In-Home Services* (Santa Cruz County 22CV02801); and *Paredes v.*
27 *Constant Staffing, LLC* (Monterey County 23CV002616).

1 10. I have also assisted the firm and co-counsel in numerous wage and hour class action
2 mediations.

3 11. Currently, the firm serves as counsel for plaintiff(s)/the class in multiple ongoing wage
4 and hour class actions in Alameda County Superior Court, Monterey County Superior Court, Nevada
5 County Superior Court, San-ta Clara Superior Court, San Benito Superior Court, San Bernardino County
6 Superior Court, San Joaquin County Superior Court Santa Cruz Superior Court, Ventura County
7 Superior Court, and the United States District Courts for the Eastern and Northern District of California.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing is
9 true and correct and if called as a witness I could and would competently testify to each of the matters
10 stated herein, and I state that these matters are based upon my own personal knowledge acquired
11 through first-hand observation, except where stated otherwise. This declaration was executed by me on
12 June 4, 2025, in Salinas, California.

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Alison L. Baker