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Attorneys for Defendants Espinoza Brothers
 Food Distribution, Inc. and Espinoza Brothers
 Enterprises LLC

STATE OF CALIFORNIA

SUPERIOR COURT FOR THE COUNTY OF FRESNO

CRUZ SOTO, individually, and on behalf of
 all others similarly situated,

Plaintiff,

v.

ESPINOZA BROTHERS FOOD
 DISTRIBUTION, INC., a California
 corporation, ESPINOZA BROTHERS
 ENTERPRISES LLC, a California limited
 liability company, and DOES 1 through 10,
 inclusive

Defendant(s).

Case No.: 22CECG03830

**DECLARATION OF IAN B. WIELAND,
 ESQ. IN SUPPORT OF RENEWED
 MOTION FOR PRELIMINARY
 APPROVAL**

Complaint Filed: November 30, 2022
 Trial Date: None Set

I, Ian B. Wieland, do hereby declare and state:

1. I am an attorney duly admitted to practice law in the State of California and I am a shareholder in the law firm of Sagaser, Watkins & Wieland, PC, counsel of record for Defendants Espinoza Brothers Food Distribution, Inc. and Espinoza Brothers Enterprises LLC (collectively "Defendants"), in the above referenced matter.

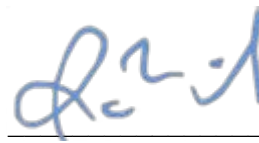
2. I have personal knowledge as to all matters stated herein, and if called to testify as a witness, I could and would competently testify to them under oath.

3. There are no other class, representative, or other collective actions in any other court in this or any other jurisdiction that assert claims similar to those asserted in this action on behalf of a class or group of individuals who would also be members of the class defined in this action.

1 4. The class period for this matter is from June 5, 2018 through March 9, 2024 (“Class
2 Period”). Based on Defendants’ records (i.e. payroll and personnel files), Defendants employed 106
3 class members who collectively worked a total of 5,136 workweeks, during the Class Period.

4 5. The identities of such class members can be easily obtained by way of Defendants’
5 payroll records and/or other business records regularly kept in the course of business. I am informed
6 and believe this to be true as my office received a copy of such payroll records which provided such
7 data in preparation for the mediation successfully completely in this matter.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing
9 is true and correct, and that this Declaration was executed on the 29th day of April 2025 at Fresno,
10 California.



Ian B. Wieland