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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SONOMA**

JOSE VASQUEZ RUIZ, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

vs.

PERDUE FOODS, LLC., a Maryland
limited liability company; and DOES 1
through 50, inclusive,

Defendants.

Case No.: SCV 264649

**DECLARATION OF JOSE VASQUEZ RUIZ
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: TBD
Time: TBD
Dept.: 16

DECLARATION OF JOSE VASQUEZ RUIZ

I, Jose Vasquez Ruiz, declare as follows:

1. I am an individual over the age of 18 years old and am a resident of California. I am the named Plaintiff in this matter. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I am a current employee of Perdue Foods, LLC ("Defendant"). I have been employed by Defendant since in or around 2013. Throughout my employment with Defendant, I have been classified as an hourly, non-exempt employee.

3. During my employment with Defendant I have earned overtime and/or double overtime wages. Whenever overtime/double wages were paid, my wage statement did not identify the overtime rate as 1.5 times my regular rate of pay or the double time rate as 2 times my regular rate of pay. Rather, the overtime rates appeared as one-half (0.5) the regular hourly rate of pay, and the double time rate appeared as the regular hourly rate of pay.

4. I understand that this action was brought on behalf of other non-exempt employees in the State of California, and that I am acting as a representative for the Class. As the Class Representative, I understand that it is my responsibility to act in the best interest of the Class and not my own. I agree that I will not put my own interests ahead of the Class, and that I will not settle out my claims separately or independently from the Class. Moreover, I am not aware of any conflicts that exist between my interests and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

5. I have and continue to be willing to assist in the investigation of this matter, including meeting and/or discussing the case with my attorneys, providing necessary information and documents, making myself available for trial or any further proceedings in this matter as required to represent the interests of the Class. I also understand my duties and responsibilities to the proposed Class and will carry out those duties as necessary.

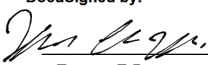
6. I have personally met with Class Counsel on various occasions to discuss the case, provide documents and information to Class Counsel, and review the Joint Stipulation.

7. I discussed the terms of the Settlement with my attorneys, and based on the

1 information provided, I believe the Settlement to be fair, adequate, and reasonable for myself and
2 for the entire Class.

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

5 Executed on this ¹¹ day of September, 2020, at Sonoma, California.

6 DocuSigned by:
7 
8 _____
9 D6A98541EB74D3
10 Jose Vasquez Ruiz