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10 Attorneys for Defendants,

11 DESERT VALLEY DATE LLC; JOOLIES, LLC;

12 DVD FARMING, LLC; and DVD FACILITY, LLC

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **FOR THE COUNTY OF RIVERSIDE – HISTORIC COURTHOUSE**

15 ADA MENDOZA, as an individual and on behalf
16 of all others similarly situated,

17 Plaintiff,

18 vs.

19 DESERT VALLEY DATE, LLC, a California
20 company; and DOES 1 through 100,

21 Defendants.

Case No.: CVRI2301048

**CLASS & REPRESENTATIVE PAGA
ACTION**

**DECLARATION OF GREGORY
WILLSEY IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL**

*[Assigned for All Purposes to the Hon.
Harold W. Hopp; Dept. 1]*

Complaint Filed: March 1, 2023

Trial Date: Not Yet Set

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I, Gregory Willsey, declare as follows:

1. I am over 18 years of age. I am a Member-Manager of DESERT VALLEY DATE LLC who is a party to this action. I make this declaration in support of Plaintiff's Motion for Preliminary Approval. I have personal knowledge of the facts set forth in this declaration and, if called, as a witness, I could and would testify competently to such facts.

2. Defendants DESERT VALLEY DATE LLC; JOOLIES, LLC; DVD FARMING, LLC; and DVD FACILITY, LLC (collectively, “Defendants”) collectively operate as a grower and processor of date fruit, sourcing fruit primarily from California-based farms and processing that fruit at a facility based in Coachella, California. They acquired the business in the summer of 2020, putting in place a sizable term loan and a revolving line of credit.

3. Within a year of the acquisition, inflation (on packaging, ingredients, freight and storage) and interest rates (on the line of credit) began to increase at unprecedented levels, which collectively wiped out Defendants' profits entirely.

4. The California date fruit industry then experienced two consecutive harvests in 2022 and 2023 that were among the worst in over 30 years. Hurricane Hilary, in particular, decimated the 2023 crop across California, causing yields that were more than 30% below normal and creating significant mold issues.

5. Defendants were forced to short customers due to a lack of fruit, depressing revenues despite having a sizable fixed cost base. Additionally, Defendants were forced to hire more than 40 additional full-time employees to sort through the moldy fruit in order to supply whatever product it could to customers. This caused labor costs to spike.

6. Defendants lost a considerable amount of money in the 2023 and 2024 calendar years, while seeing their accounts payable balloon.

7. While the 2024 crop was much more normal, it will take years before Defendants are able to fully catch up on the accounts payable balance.

8. That said, Defendants are able to operate the business and believe in their ability to adhere to the payment plan that was agreed to.

9. As requested in section G(3)(b) of this Court's Case Management Order #1, dated March 2, 2023, I am not aware of any other class, representative, or other collective actions in any other court or jurisdiction that assert claims similar to the those asserted in this action on behalf of a class or group of individuals some or all of whom would also be members of the class defined in this action.

10. As part of the settlement of this matter, the Parties have selected Phoenix Settlement Administrators (“PSA”) to the settlement administrator. I have no financial or other interest in PSA. To my knowledge, no agent, officer, and/or director of any of the Defendants has any financial or other interest in PSA.

11. As requested in section G(3)(c)(iv) of this Court’s Case Management Order #1, dated March 2, 2023, as part of the settlement of this matter the Parties have selected Coachella Valley Housing Coalition (“CVHC”) to be the *cy pres* beneficiary. I have no financial or other interest in CVHC. To my knowledge, no agent, officer, and/or director of Defendants has any financial or other interest in CVHC.

12. The work experience range of the Settlement Class Members is two weeks to 5 years.

13. As requested in section G(3)(k)(ii) of this Court's Case Management Order #1, dated March 2, 2023, the education range of the Settlement Class Members is some high school to high school graduate.

14. As requested in section G(3)(k)(ii) of this Court's Case Management Order #1, dated March 2, 2023, the majority of the Settlement Class Members do not have the ability to competently read and comprehend English such that Spanish translation of the Class Notice will be provided.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on Jul 28, 2025 , at Venice , California.

Gregory Willsey
Gregory Willsey (Jul 28, 2025 11:51:17 PDT)

Gregory Willsey