

HAINES LAW GROUP, APC

Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Fletcher W. Schmidt (SBN 286462)
fschmidt@haineslawgroup.com
Andrew J. Rowbotham (SBN 301367)
arowbotham@haineslawgroup.com
Susan J. Perez (SBN 329044)
sperez@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355
Attorneys for Plaintiff

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

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

vs.

DESERT VALLEY DATE, LLC, a
California company; and DOES 1 through
100,
Defendants.

Case No. CVRI2301048

*[Assigned to Hon. Harold W. Hopp
Department 1]*

**DECLARATION OF PEDRO S.G.
RODRIGUEZ OF COACHELLA VALLEY
HOUSING COALITION IN SUPPORT OF
APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT**

Date: August 25, 2025
Time: 8:30 a.m.
Dept.: 1

Action Filed: March 1, 2023
Trial Date: None Set

DECLARATION OF PEDRO S.G. RODRIGUEZ

I, Pedro S.G. Rodriguez, declare as follows:

1. I am an individual over the age of 18 and hold the position of Executive Director/CEO at Coachella Valley Housing Coalition ("CVHC"). I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so. This declaration is submitted for the purpose of CVHC being named as the *cy pres* recipient in the proposed class and PAGA action settlement reached in this case.

2. I am qualified to submit this declaration on behalf of CVHC, having served as the Executive Director/Chief Executive Officer (CEO) since 2021. Prior to becoming Executive Director/CEO I served as CVHC's Chief Financial Officer (CFO) for 26 years. I have a deep understanding of the complexities of managing a nonprofit community development organization both administratively and financially and I am highly committed to pursuing the mission of CVHC.

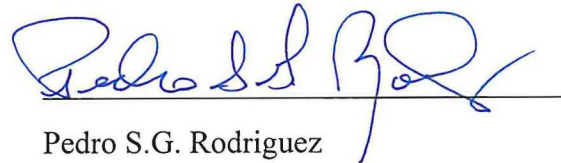
3. As requested in section G(3)(c)(iii)(A) of this Court's Case Management Order #1, dated March 2, 2023, CVHC is a nonprofit organization. Coachella Valley Housing Coalition (CVHC) is a community development corporation serving farmworkers, their families, and other low-income residents (such as seniors, veterans, and individuals with chronic illnesses) in distressed rural and desert communities from Riverside to Imperial Counties.

4. As requested in section G(3)(c)(iii)(B) of this Court's Case Management Order #1, dated March 2, 2023, CVHC engages in three key activities: (1) develop and manage multi-family affordable rental housing and community-serving infrastructure; (2) provide a mutual self-help homeownership program including homebuyer education, credit counseling, technical assistance, and construction supervision; and (3) engage residents to plan and provide community-serving programs to promote health, well-being, and education

5. As requested in section G(3)(c)(iii)(C) of this Court's Case Management Order #1, dated March 2, 2023, CVHC serves residents in Riverside and Imperial Counties. Since its founding in 1982, CVHC has developed more than 3,000 units of affordable rental housing including California's first affordable housing complex for retired farmworkers; helped 2124

1 families build and purchase their own single-family homes through a culturally relevant Mutual
2 Self-Help homeownership program. CVHC's major programmatic areas of work include the
3 development of both rental and homeownership housing in Riverside and Imperial Counties that
4 serve farmworkers, migrant farmworkers, veterans, very low- and low-income families, and
5 adults with special needs such as development disabilities, and/or other chronic illnesses. CVHC
6 continues to develop meaningful and needed human development programs and initiatives by
7 providing a pipeline of resident-based Community Services. Programs include early childhood
8 education programs, afterschool programs, homeownership and financial education classes,
9 computer technology classes, ESL instruction, an Alternative High School Diploma and GED
10 Program, tutoring, homework assistance, ballet folkloric dance and mariachi music instruction,
11 and a myriad of other opportunities that enrich the lives of the people living in its housing.

12
13 I declare under penalty of perjury under the laws of the state of California and the United
14 States that the foregoing is true and correct. Executed on July 28, 2025, at Indio, California.

15
16 
17 Pedro S.G. Rodriguez