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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BENITO**

ESPIRIDION GOPAR, an individual and on
behalf of all others similarly situated,

Plaintiff,

TAYLOR FARMS RETAIL, INC.; and DOES 1
through 50, inclusive,

Defendant.

Case No. CU-24-00222

**DECLARATION OF ALISON BAKER IN
SUPPORT OF PLAINTIFFS' MOTION
FOR APPROVAL OF PAGA
SETTLEMENT UNDER CALIFORNIA
LABOR CODE § 2698 ET SEQ.**

[Assigned for all purposes to The Honorable
Omar Rodriguez, Dept. 1]

Date: June 22, 2026
Time: 10:30 a.m.
Dept.: 1
Action Filed: September 11, 2024
Trial Date: None Set

1 **DECLARATION OF ALISON BAKER**

2 I, Alison Baker, declare as follows:

3 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
4 California, and am with the law firm Fitzpatrick & Swanston, counsel of record for Plaintiffs Silvia
5 Armenta, Maria Castro Garcia, Enedina De La Torre, Espiridion Gopar, Socorro Sena, and Adolfo
6 Esquivel Illu ("Plaintiffs"). I have personal knowledge of the facts set forth below, and if called to
7 testify, I could and would do so competently.

8 2. The settlement meets the criteria for this Court to approve the settlement, as the
9 settlement is fair, adequate, and reasonable given the inherent risks of litigation, including the
10 substantial risks and the costs of pursuing such litigation. The settlement is the result of extensive
11 arm's-length negotiations between the Parties and their counsel and was facilitated by an experienced
12 mediator. The Parties mediated with Tipper Ortman to facilitate settlement discussions. The Parties
13 continued negotiations with the assistance of Mr. Ortman. As a result of those negotiations, the
14 Parties reached a tentative settlement to settle the PAGA claims.

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

26 4. In the year 2000, I changed my practice focus to plaintiff's-side litigation and I joined
27 the National Association of Consumer Advocates. From 2000-2008, I focused on consumer
28 protection and public interest cases, including many consumer class actions and representative

1 actions. While employed with the law firm Kemnitzer, Anderson, Barron & Ogilvie in San
2 Francisco, CA, I acted as lead trial counsel in civil jury and bench trials and successfully resolved
3 representative consumer actions and obtained injunctions on behalf of thousands of Californians.
4 My work emphasized Spanish-language protections in consumer financing, redressing fraud and
5 misrepresentations in auto sales and leasing, and challenging unfair debt collection practices and
6 unfair/unlawful credit reporting.

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

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

18 7. In October 2022, I joined the law firm Fitzpatrick & Swanston, where my practice
19 focuses on employment matters involving both class actions and single plaintiffs. The firm has
20 handled hundreds of wage and hour cases to conclusion and has been class counsel and/or co-counsel
21 in over 100 class actions. I am currently handling, or have handled, numerous wage and hour class
22 action lawsuits, including but not limited to *Aquino (Reyes) v. Coast King Packing, LLC* (Monterey
23 County Case No. 21CV002448); *Arrellano v. Rocha Brothers Farms, LLC* (Santa Cruz County Case
24 No. 21CV01286); *Aguas v. Coast 2 Coast Coaching Inc.* (Monterey County Case No. 23CV001404);
25 *Bravo v. Mann Packing Co. Inc.* (Monterey County Case No. 23CV002342); *Campana v. Vista Verde*
26 *Labor, Inc.* (Monterey County Case No. 23CV000638); *Hernandez v. Pro Ag Harvesting* (Monterey
27 County Case No. 23CV000826); *Jimenez v. Sea House Salinas, LLC* (Monterey County Case No.
28 23CV000504); *Mendoza v. Care From the Heart In-Home Services* (Santa Cruz County 22CV02801);

1 and *Paredes v. Constant Staffing, LLC* (Monterey County 23CV002616).

2 8. I have also assisted the firm and co-counsel in numerous wage and hour class and
3 representative actions.

4 9. The firm currently serves as counsel for plaintiff(s)/the class/PAGA members in
5 multiple ongoing wage and hour class and representative actions in Alameda County Superior Court,
6 Monterey County Superior Court, Nevada County Superior Court, San Benito County Superior
7 Court, San Bernardino County Superior Court, San Joaquin County Superior Court, Santa Clara
8 County Superior Court, Santa Cruz County Superior Court, Ventura County Superior Court, and the
9 United States District Courts for the Eastern and Northern District of California.

10 10. I have no conflict of interest with Plaintiffs or the PAGA Members. I will adequately
11 and zealously represent Plaintiffs and the PAGA Members, pursuing this lawsuit to its conclusion.

12 I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct, and if called as a witness, I could and would competently testify to
14 each of the matters stated herein, and I state that these matters are based upon my own personal
15 knowledge acquired through first-hand observation, except where stated otherwise. This
16 declaration was executed by me on May 28, 2026, in Salinas, California.

17 /s/ Alison L. Baker

18 Alison L. Baker
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