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

ALICIA ESQUIVEL GERLETTE, as an
individual and on behalf of all others similarly
situated,

Plaintiff,

vs.

ALTMAN SPECIALTY PLANTS, LLC, a
California Limited Liability Company; and
DOES 1 through 100,
Defendant.

Case No. 30-2023-01324651-CU-OE-CXC

*[Case assigned for all purposes to the Hon.
Layne H. Melzer, Dept. CX102]*

**DECLARATION OF ALICIA ESQUIVEL
GERLETTE IN SUPPORT OF APPROVAL
OF CLASS ACTION SETTLEMENT**

Action Filed: May 10, 2023
Trial Date: None Set

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I, Alicia Esquivel Gerlette, declare as follows:

1. I am an individual over the age of 18 and am the named Plaintiff in this matter.

This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Altman Specialty Plants (“Altman”) from approximately February 7, 2019, until approximately February 21, 2022. As a “Merchandiser,” my primary job duties included ordering, monitoring, and stocking inventory for Altman’s various Southern California nursery locations.

3. During my employment, I was regularly required to work through my first meal period or return to work before I received a full 30 minutes on break. I also regularly worked shifts that were over 10 hours long, but I was never provided a second meal period. When I was provided a rest break, I had to be back at my work area by the end of the 10-minute break, this meant I had to spend some of my break time walking back to my work area. Altman required that I use my personal cellphone to communicate with supervisors and did not reimburse me for a portion of my cellphone bill.

4. I brought this lawsuit against Altman because I suspected that Altman was not paying its employees according to the law and felt that the company should not be allowed to violate the law at its employees' expense. I was willing to attach my name to the lawsuit, even though I understood it would be a public record, because I felt that someone needed to stand up to the company and I was willing to take on that burden for the benefit of the other employees of Altman.

5. I have been an active participant in this case since first consulting with my attorneys in June 2022. In addition to meeting with my attorneys during the initial intake process and providing documents and information necessary to start the case, I remained actively involved throughout the litigation. I participated in strategy discussions with my attorneys, provided information about Altman's timekeeping practices, rest and meal period policies, and other

1 workplace procedures, and assisted with preparing for mediation by answering case-related
2 questions and sharing my personal experience. I also made myself available for the entire day of
3 mediation. I estimate that I have spent at least 20 hours on activities leading to the resolution of
4 this matter.

5 I declare under penalty of perjury under the laws of the state of California and the United
6 States that the foregoing is true and correct. Executed on May 13, 2025, in Riverside,
7 California.



Alicia Gerlette (May 13, 2025 15:23 PDT)

Alicia Esquivel Gerlette