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Attorneys for Plaintiff,
Erika Perez Paredes on behalf of herself
and all similarly aggrieved employees

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

ERIKA PEREZ PAREDES, on behalf of
herself and all similarly aggrieved
employees,

Plaintiff,

v.

CONSTANT STAFFING, LLC; DEL
MONTE FRESH PRODUCE N.A., INC.;
MANN PACKING CO., INC.; and DOES
1 through 50, inclusive,

Defendants.

Case No. 23CV002616

(Assigned to the Honorable Ian A. Rivamonte,
Dept. 14)

**DECLARATION OF ALISON L. BAKER IN
SUPPORT OF PLAINTIFF’S FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND JUDGMENT**

Date: February 20, 2026
Time: 8:30 A.M.
Dept.: 14

Action Filed: July 20, 2023
Trial Date: None Set

1 I, Alison L. Baker, hereby declare and state as follows:

2 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
3 California, and I am an associate with the law firm Fitzpatrick & Swanston, counsel of record for
4 Plaintiff ERIKA PEREZ PAREDES ("Plaintiff"). I have personal knowledge of the facts set
5 forth below and if called to testify I could and would do so competently.

6 2. I believe this Settlement to be fair, reasonable, and adequate, and in the best
7 interest of the Class Members as a whole.

8 3. I am one of the primary attorneys on this matter. I have spent significant time
9 pursuing the claims that have been alleged in this action. From the inception of the case, my co-
10 counsel and I will adequately represent the Class Members in this action and will zealously
11 represent the Plaintiff and the Class Members and pursue this lawsuit to its conclusion.

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

24 5. In the year 2000, I changed my practice focus to plaintiff's-side litigation and I
25 joined the National Association of Consumer Advocates. From 2000-2008, I focused on
26 consumer protection and public interest cases, including many consumer class actions and
27 representative actions. While employed with the law firm Kemnitzer, Anderson, Barron &
28

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

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

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

18 8. 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-
21 counsel in over 100 class actions. I am currently handling, or have handled, numerous wage and
22 hour class action lawsuits, including but not limited to *Aquino (Reyes) v. Coast King Packing,*
23 *LLC* (Monterey County Case No. 21CV002448); *Arrellano v. Rocha Brothers Farms, LLC*
24 *(Santa Cruz County Case No. 21CV01286); Aguas v. Coast 2 Coast Coaching Inc.* (Monterey
25 *County Case No. 23CV001404); Bravo v. Mann Packing Co. Inc.* (Monterey County Case No.
26 *23CV002342; Campana v. Vista Verde Labor, Inc.* (Monterey County Case No. 23CV000638);
27 *Hernandez v. Pro Ag Harvesting* (Monterey County Case No. 23CV000826); *Jimenez v. Sea*
28

1 *House Salinas, LLC* (Monterey County Case No. 23CV000504; *Mendoza v. Care From the*
2 *Heart In-Home Services* (Santa Cruz County 22CV02801); and *Paredes v. Constant Staffing,*
3 *LLC* (Monterey County 23CV002616).

4 9. I have also assisted the firm and co-counsel in numerous wage and hour class
5 actions.

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

12 11. I do not have a conflict of interest with Plaintiff or the Class Members. I will
13 adequately represent the Class. I have and will zealously represent Plaintiff and the Class
14 Members and pursue this lawsuit to its conclusion.

15 12. I do not have any relationship with the proposed *cy pres* recipient, California
16 Rural Legal Assistance, Inc., that would create an actual or potential conflict of interest. The
17 Parties further agree that proposed *cy pres* satisfies the legislative intent set out in Code of Civil
18 Procedure § 384(a), in that the organization helps further the purposes of the underlying action
19 and promote justice for all Californians.
20

21 I declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct and if called as a witness I could and would competently testify to
23 each of the matters stated herein, and I state that these matters are based upon my own personal
24 knowledge acquired through first-hand observation, except where stated otherwise. This
25 declaration was executed by me on January 27, 2026, in Salinas, California.

26
27 /s/ Alison L. Baker
28 Alison L. Baker