

DREW LEWIS, PC

Drew Lewis, Esq. (SBN 309288)
3010 Lava Ridge Ct. Ste. 120
Roseville, CA 95661
Tel: (833) 600-7400
Email: drew@drewlewis.law

Attorneys for Plaintiff RIGOBERTO VALLE
(See additional counsel information next page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF STANISLAUS

**IN RE: STANISLAUS FOOD PRODUCTS
COMPANY EMPLOYMENT CASES**

CASE NO.: CV-23-001433

Included Actions:

Assigned to the Hon. John Freeland

*Rigoberto Valle v. Stanislaus Food Products
Company, Case No. CV-23-001433*

**DECLARATION OF MARIO CASTILLO
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

*Mario Castillo v. Stanislaus Food Products
Company, Case No. CV-23-003465*

Hearing

*Victoria Martinez v. Stanislaus Food Products
Company, Case No. CV-23-004653*

Date: December 20, 2024

Time: 8:30 a.m.

Dept.: 23

*Rebeca Balbuena Andres v. Stanislaus Food
Products Company, Case No. CV-23-007019*

*Martin Sohal v. Stanislaus Food Products
Company, Case No. CV-24-000548*

1 **BOKHOUR LAW GROUP, P.C.**

2 Mehrdad Bokhour, Esq., CA Bar No. 285256
3 1901 Avenue of the Stars, Suite 450
4 Los Angeles, California 90067
5 Tel: (310) 975-1493; Fax: (310) 675-0861
6 Email: mehrdad@bokhourlaw.com

7 **FALAKASSA LAW, P.C.**

8 Joshua S. Falakassa, CA Bar No. 295045
9 1901 Avenue of the Stars, Suite 450
10 Los Angeles, California 90067
11 Tel: (818) 456-6168; Fax: (888) 505-0868
12 Email: josh@falakassalaw.com

13 Attorneys for Plaintiff MARIO CASTILLO

14 **HAINES LAW GROUP, APC**

15 Paul K. Haines (SBN 248226)
16 Fletcher W. Schmidt (SBN 286462)
17 Matthew K. Moen (SBN 305956)
18 Susan J. Perez (SBN 329044)
19 2155 Campus Drive, Suite 180
20 El Segundo, California 90245
21 Tel: (424) 292-2350
22 Fax: (424) 292-2355
23 Email: phaines@haineslawgroup.com
24 fschmidt@haineslawgroup.com
25 mmoen@haineslawgroup.com
26 sperez@haineslawgroup.com

27 Attorneys for Plaintiff VICTORIA MARTINEZ

28 **BRADLEY/GROMBACHER, LLP**

Marcus Bradley, Esq. (SBN 174156)
Kiley Grombacher, Esq. (SBN 245960)
Lirit A. King, Esq. (SBN 252521)
Emilie MacLean, Esq. (SBN 349539)
31365 Oak Crest Drive, Suite 240
Westlake Village, CA 91361 Telephone: (805) 270-7100
Facsimile: (805) 270-7589
Email: mbradley@bradleygrombacher.com
kgrombacher@bradleygrombacher.com
lking@bradleygrombacher.com
maclean@bradleygrombacher.com

DECLARATION OF MARIO CASTILLO

I, Mario Castillo, state and declare:

1. I am the Plaintiff in the above-captioned action and have personal knowledge of all matters stated herein, and could competently testify thereto. I make this declaration in support of the motion for preliminary approval of the class action settlement.

2. I believe the settlement is fair and reasonable and constitutes a fair resolution of the alleged claims.

3. During my employment with Defendant, several issues concerned me, which I thought did not comply with California law, such as not being paid properly, not getting paid all overtime and minimum wages, failure to provide proper meal periods and rest breaks, wage statement violations; waiting time penalties; failure to pay wages during employment or upon discharge; failure to pay all sick time; failure to provide itemized wage statements and maintain accurate records; failure to provide suitable seating; failure to minimize excessive indoor heat; failure to provide copies of employment records; failure to provide written notice of employment terms; failure to reimburse necessary business expenses; unlawful competition; and PAGA penalties. Even though I was unsure if I wanted to bring a lawsuit because of the risk of stepping forward as a whistle-blower (since this could jeopardize my livelihood in the industry and make it difficult to find future jobs), I retained my attorneys to proceed with this class action because I did not think that myself or the other employees were being treated correctly.

4. When I first retained my attorneys and chose to pursue this case on a class action basis, I understood that I had specific burdens as the "Class Representative," which included: (a) representing the interests of all class members, (2) considering the interests of all class members above my own personal interests, (3) participating actively in the lawsuit, including deposition, and keeping generally aware of the status and progress of the lawsuit. Moreover, I understood that any resolution of the lawsuit is subject to court approval and must be designed in the best interests of the class as a whole.

5. I respectfully request that the court approve the service award for the following reasons.

6. First, I have spent substantial time working on this case and have performed substantial services for the Class to help obtain a highly beneficial settlement for my fellow employees.

7. On or about June 2023, I initiated a Class Representative Action Complaint in the Superior Court of California, Stanislaus County. This action represents my interests and that of all other current and former non-exempt employees similarly situated. Subsequently, the complaint In Re: Stanislaus Food Products Company Employment Cases was consolidated to include myself and other plaintiffs and other similarly aggrieved employees.

8. Since initiating this action, I estimate I have spent approximately 35-40 hours engaging in activities to benefit the class. I have assisted my attorneys in numerous ways, including helping to explain and discuss the company's practices and their general practices and procedures, locating and analyzing company documents, and communicating with other class members. These efforts occurred through numerous meetings with Class Counsel, telephone conferences, letters, emails, and text communications. I also spent substantial time assisting with the preparation for mediation.

9. My work also continued after mediation, as I reviewed settlement agreements and other settlement documents and continued communication with my lawyers during the settlement approval processes.

10. Second, I respectfully request that the Court approve the agreed-upon service award because I agreed to set aside my personal interests and put the class's interests ahead or on par with my own. In doing so, and by successfully bringing this case as a class action, I helped to obtain a highly beneficial settlement for the class members.

11. Third, as a condition of this class action settlement, I was required to release and waive all possible individual claims against the company – something that none of the other class members were required to give up.

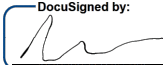
12. Fourth, by bringing this case as a class action, I undertook significant risks and stresses at a high emotional cost without any guarantee of success. For example, filing this lawsuit and being a whistle-blower was stressful daily as I constantly worried about the risk that this case

1 could impact my ability to find future jobs. This stress/risk lasted for the entire case, and I'm
2 worried it may make it hard to find a job in the future since the case information is all available
3 online.

4 13. Fifth, bringing this case also came with a major financial risk because, if I lost the
5 case, I would be required to pay the company's costs, which could be over \$10,000, and there was
6 a chance they could try to make me pay their attorneys' fees as well.

7 14. I affirm my unwavering dedication to representing the interests of the putative class
8 and aggrieved employees. I voluntarily assumed considerable risks and expended considerable
9 effort to secure a favorable outcome. I trust that the Court will duly consider my request for a
10 Service Award in recognition of these contributions.

11
12 I declare under penalty of perjury under the laws of the State of California that the foregoing
13 is true and correct. Executed on Nov -25-2024, at 11:55, California.

14
15 
16 Mario Castillo
17
18
19
20
21
22
23
24
25
26
27
28