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SUPERIOR COURT STATE OF CALIFORNIA
COUNTY OF STANISLAUS

RIGOBERTO VALLE on behalf of
himself and similarly situated employees,

Plaintiff(s),

v.

STANISLAUS FOOD PRODUCTS
COMPANY, a California Corporation;
DOES 1-20, inclusive,

Defendant(s).

Case No.: CV-23-001433

**DECLARATION OF RIGOBERTO
VALLE IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL**

Date: December 20, 2024
Time: 8:30 a.m.
Judge: Hon. John D. Freeland
Dept.: 23

Complaint Filed: March 21, 2023
Trial Date: **Not Set**

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DECLARATION OF RIGOBERTO VALLE

I, RIGOBERTO VALLE, declare as follows:

1. I am over eighteen years of age and if called as a witness, I could competently testify to the following facts from my personal knowledge. I am a named Plaintiff in the above wage and hour class action filed against STANISLAUS FOOD PRODUCTS COMPANY (herein after "Defendants").

2. This declaration is being submitted in support of Plaintiffs' Motion for Final Approval of Class Action and PAGA Settlement.

3. I believe that I am, have been, and will continue to represent the interests of the class fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking to represent.

1. I worked for Defendants STANISLAUS FOOD PRODUCTS COMPANY ("Defendants") as a "Pan Operator", beginning approximately in 1980, as a non-exempt employee, receiving an hourly wage. During my employment, I was denied legally compliant meal and rest periods. Additionally, I was denied timely payment of all wages when due. This occurred throughout my employment with the company during which I was at all times subject to the company's written policies and procedures.

4. While I was subject to these practices, I believe that others at the company were as well. As such, my claims are typical of the claims of the Class Members that I am seeking to represent because I was subject to the same alleged unlawful employment policies and practices at issue in this action, including but not limited to, Defendants' failure to provide complaint meal and rest periods, failure to pay for all hours worked, and failure to pay all wages when due. Factually, Defendant's policies and practices apply class wide, and Defendant's liability can be determined by facts common to all members of the Class.

5. During the course of this action there has been no conflict of interest between myself and the class that I am seeking to represent.

6. I understood that at the time I filed this action, as a Class Representative, I owed

1 a duty to the putative class members to faithfully prosecute this action with their best interests at
2 the forefront of every decision. I understood that I could not make any decision in this action for
3 the sole benefit of my personal interest. I understood that in executing this duty, I might have
4 been asked to sacrifice my personal best interests for the benefit of the interests of the putative
5 class members. Nevertheless, I knowingly and voluntarily undertook this duty in order to
6 provide the broadest possible relief for my former co-workers for what I perceived to be
7 Defendant's unlawful wage and hour practices. I believe that I faithfully executed the duties of a
8 Class Representative throughout this litigation and will continue to do until this litigation is fully
9 and finally resolved.

10 7. I believe that the proposed settlement before the Court is fair, reasonable, and
11 adequate, and made in the best interest of the Settlement Class Members. Consequently, I
12 respectfully, and humbly, ask the Court to grant final approval of the Settlement and all of its
13 terms.

14 8. I have been involved in this case since before it was even filed. Among other
15 thing I searched for and I searched for and provided relevant documents to my attorneys for use
16 in the lawsuit, provided factual information to my attorneys, had various phone calls with my
17 attorneys to discuss the claims in the lawsuit and Defendant's practices, assisted my attorneys to
18 help them prepare for mediation, made myself available during mediation to assist my attorneys
19 I discussed the settlement with my attorneys and gave my input throughout the process. I
20 estimate that I have spent approximately 25 to 30 hours in total on these activities.

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23 I declare under penalty of perjury under the laws of the State of California that the facts
24 stated in this declaration are true and correct and that this declaration was executed on
25 11 / 26 / 2024, in Patterson, California.

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Rigoberto Valle.
RIGOBERTO VALLE