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Attorneys for Defendants
**WILSON CREEK WINERY & VINEYARDS,
INC.; WILSON CREEK FAMILY LLC; and
WILSON CREEK MANOR LLC**

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

BRENDA BUSTILLO, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

v.

WILSON CREEK WINERY &
VINEYARDS, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

CASE NO.: CVRI2305704
(CONSOLIDATED)

[Consolidated Case No. CVRI2306189]

**DECLARATION OF KRISTIN A. KAMEEN
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL**

Dept.: 1
Judge: Hon. Harold W. Hopp
Filed: October 23, 2023
Trial: Not Set

DAYMIAN GUTIERREZ, individually, and
on behalf of other members of the general
public similarly situated,

Plaintiff,

v.

WILSON CREEK FAMILY LLC, a
California limited liability company;
WILSON CREEK MANOR LLC, a
California limited liability company;
WILSON CREEK WINERY &
VINEYARDS, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

I, Kristin A. Kameen, Esq., declare as follows:

1. I am an attorney duly licensed to practice law before all of the courts of the State of California, and am a shareholder at the law firm of Pettit Kohn Ingrassia Lutz & Dolin PC, attorneys of record for Defendant WILSON CREEK WINERY & VINEYARDS, INC. (“Defendant”) in the above-captioned case. I am familiar with the facts and proceedings of this case and if called as a witness, I could and would competently testify to the following facts of my own personal knowledge.

2. This declaration is submitted in support of plaintiff’s motion for preliminary approval pursuant to section G(3)(b) of Case Management Order #1 in the instant action.

3. I am unaware of any pending class, representative, or other collective action in any other court in this or any other jurisdiction that asserts claims similar to those asserted in this action on behalf of a class or group of individuals some or all of whom would be members of the class defined in this action.

4. I am aware of a dismissed action, *Gutierrez v. Wilson Creek Family, LLC, et al.*, Riverside Superior Court Case No. CVRI2306189, filed November 15, 2023, that alleged wage-and-hour violations on a class basis. Gutierrez filed the putative class action lawsuit against Wilson Creek Family, LLC, Wilson Creek Manor, LLC, and Wilson Creek Winery & Vineyards, Inc., alleging violations of (1) Labor Code sections 510 and 1198 (unpaid overtime); (2) Labor Code sections 226.7 and 512(a) (unpaid meal period premiums); (3) Labor Code section 226.7 (unpaid rest period premiums); (4) Labor Code sections 1194 and 1197; (5) Labor Code sections 201 and 202 (final wages not timely paid); (6) Labor Code section 226(a) (non-compliant wage

1 statements); (7) Labor Code sections 2800 and 2802 (unreimbursed business expenses); and (8)
2 Business & Professions Code section 17200 (unfair competition).

3 5. Gutierrez defined the proposed class as “all current and former hourly-paid or non-
4 exempt employees of Defendants within the State of California at any time during the period from
5 four years preceding the filing of this Complaint to final judgment.”

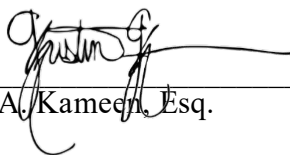
6 6. Due to the overlap in parties, claims, and putative class period, the Court
7 consolidated the *Gutierrez* action with the instant action on January 31, 2024.

8 7. The parties to the *Gutierrez* action entered into an individual settlement agreement
9 that settled Gutierrez’s individual claims. Following this resolution, Gutierrez dismissed the
10 remaining class claims in his action without notice to the potential class pursuant to California
11 Rule of Court, rule 3.770. The Court dismissed Gutierrez’s individual claims with prejudice and
12 class action claims without prejudice on January 5, 2026.

13 8. As part of drafting this declaration, I ran a litigation search for newly-filed actions
14 naming the Wilson Creek entities as defendants and did not find any other matters alleging claims
15 similar to those asserted in this action on behalf of a class or group of individuals.

16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct.

18 Executed this 17th day of June, 2026, at San Diego, California.

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20 
Kristin A. Kameen, Esq.