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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF RIVERSIDE**

12
13 GABRIEL RODRIGUEZ, JESUS ESTRADA,
14 and ROBERTO ALVARADO, individuals and
on behalf of all others similarly situated;

15 Plaintiffs,

16 vs.

17 TASTEPOINT INC., a Delaware corporation;
18 FRUTAROM USA INC, a New Jersey
19 corporation; INTERNATIONAL FLAVORS
& FRAGRANCES, INC., a New York
20 corporation; CITISTAFF SOLUTIONS INC., a
California corporation; and DOES 1 through
21 50,

22 Defendants.

Case No.: CVRI2306840

[Assigned for All Purposes to:
Hon. Harold W. Hopp, Dept. 1]

**DECLARATION OF JESUS ESTRADA IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

[Filed Concurrently with Motion for
Preliminary of Approval of Class Action and
PAGA Settlement, Notice of Filing Class
Action and PAGA Settlement Agreement,
Declarations in Support Thereof, and
[Proposed] Order]

DATE: August 4, 2026

TIME: 8:30 a.m.

DEPT: 1

Action Filed: May 24, 2024

Trial Date: Not Set

1 **BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP**

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7 Attorneys for Plaintiff ROBERTO ALVARADO

1 I, Jesus Estrada, hereby declare as follows:

2 1. I am an individual over the age of 18 year and the named Plaintiff in the above-
3 captioned matter. This declaration is submitted in support of approval of the proposed class action
4 settlement ("Settlement") reached in this case. I have personal knowledge of the facts contained in
5 this declaration, and if called as a witness, could and would testify as to their accuracy.

6 2. I was employed by Defendant Tastepoint Inc. ("Defendant") as an hourly-paid, non-
7 exempt employee from approximately 2014 to June 2024 in production in Corona, California.

8 3. During my employment with Defendants, I was subject to Defendant's wage and
9 hour policies and practices that are at issue in this case. Specifically, I worked off the clock without
10 pay and did not receive all of the meal and rest periods I was entitled to. As a result of the foregoing
11 issues, I believe I received inaccurate wage statements and was not paid all wages when my
12 employment with Defendant ended. I believe other non-exempt employees of Defendant were
13 subject to the same policies and procedures discussed above and that my claims against Defendant
14 for unpaid wages and statutory and civil penalties are typical of Class Members' claims.

15 4. I have been actively involved in this case since I first retained Justice for Workers,
16 P.C. ("JFW") in March 2025. Without waiving the attorney-client privilege, prior to filing this
17 lawsuit, my attorneys explained my role and responsibilities as a Class Representative and now as a
18 Class Representative, and I understand my responsibilities as a Class Representative. Since
19 retaining my attorneys, I have had many discussions and meetings with the attorneys and staff at
20 JFW, discussions regarding Defendants' wage and hour practices and my claims in this case,
21 litigation strategy, updates on how the case was proceeding, the Settlement, and how I could help
22 the case and potential Class Members. I also gathered and reviewed documents for use in the
23 lawsuit and reviewed relevant documents with my attorneys. I estimate that I have spent at least 15
24 hours on this case from the time I first spoke with my attorneys regarding this case until the present.
25 I also understand that as part of the Settlement, I have agreed to a general release of claims against
26 Defendants, which is broader than the release of claims agreed to by other Class Members.

27 5. Furthermore, there is no conflict between my interests and the interests of the class
28 that I am seeking to represent. My interests are entirely coextensive with the interests of the Class. I

1 allege that I was injured by the same company-wide policies and practices to which the proposed
2 Class was subjected and seek the same relief. I have already demonstrated my ability to advocate
3 for the interests of the Class by initiating this litigation, undertaking extensive class discovery, and
4 evaluating the proposed settlement to assure that it is fair.

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

14 7. I understand that my attorneys will request that the Court approve a service award
15 of \$15,000.00 for my efforts on behalf of the Class. I believe this amount is reasonable based on the
16 amount of time and effort I have devoted to this case, the risks I have undertaken as a Class
17 Representative, and my general release of claims, as described above. My support for the Settlement
18 is not contingent on my receiving this service award.

19 8. I do not have any conflict of interest with the proposed Administrator, Apex Class
20 Action LLC. I am not aware of any other pending matter or action asserting claims that will be
21 extinguished or affected by the Settlement. I have not previously been a named plaintiff in any other
22 class action cases, other than this case.

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1 I declare, under penalty of perjury under the laws of the State of California, that the
2 foregoing is true and correct.

3 Executed on July 6, 2026 at Riverside, California.
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5 *Jesus Estrada*

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Jesus Estrada
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