

1 **JUSTICE FOR WORKERS, P.C.**

William C. Sung SB# 280792

2 E-Mail: william@justiceforworkers.com

Tiffany L. Luu SB# 335127

3 E-Mail: tluu@justiceforworkers.com

Joseph C. Ramli SB# 339491

4 E-Mail: jramli@justiceforworkers.com

9575 Bolsa Ave

5 Westminster, CA 92683

Tel: 323-922-2000

6 Fax: 323-922-2000

7 Attorneys for Plaintiffs GABRIEL RODRIGUEZ and JESUS ESTRADA

8 [Additional Counsel Listed on Following Page]

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

11 **FOR THE COUNTY OF RIVERSIDE**

12 GABRIEL RODRIGUEZ, JESUS ESTRADA,
13 and ROBERTO ALVARADO, individuals and
14 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
20 & FRAGRANCES, INC., a New York
21 corporation; CITISTAFF SOLUTIONS INC., a
California corporation; and DOES 1 through
50,

22 Defendants.

Case No.: CVRI2306840

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

**DECLARATION OF GABRIEL
RODRIGUEZ 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**

Norman B. Blumenthal (State Bar #068687)

2 Kyle R. Nordrehaug (State Bar #205975)

Aparajit Bhowmik (State Bar #248066)

3 Nicholas J. De Blouw (State Bar #280922)

Jeffrey S. Herman (State Bar #280058)

4 jeffrey@bamlawca.com

2255 Calle Clara

5 La Jolla, CA 92037

Telephone: (858)551-1223

6 Facsimile: (858) 551-1232

7 Attorneys for Plaintiff ROBERTO ALVARADO

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 I, Gabriel Rodriguez, 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 Defendants Tastepoint Inc. and CitiStaff Solutions Inc.
7 ("Defendants") as an hourly-paid, non-exempt employee. Defendant CitiStaff Solutions Inc. placed
8 me to work at Defendant Tastepoint Inc.'s facility in Corona, California.

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

16 4. I have been actively involved in this case since I first retained Justice for Workers,
17 P.C. ("JFW") in December 2023. Without waiving the attorney-client privilege, prior to filing this
18 lawsuit, my attorneys explained my role and responsibilities as a PAGA Representative and now as
19 a Class Representative, and I understand my responsibilities as a Class and PAGA Representative.
20 Since retaining my attorneys, I have had many discussions and in-person meetings with the
21 attorneys and staff at JFW, discussions regarding Defendants' wage and hour practices and my
22 claims in this case, litigation strategy, updates on how the case was proceeding, the Settlement, and
23 how I could help the case and potential Class Members. I also gathered and reviewed documents for
24 use in the lawsuit and reviewed relevant documents with my attorneys. I estimate that I have spent
25 at least 20 hours on this case from the time I first spoke with my attorneys regarding this case until
26 the present. I also understand that as part of the Settlement, I have agreed to a general release of
27 claims against Defendants, which is broader than the release of claims agreed to by other Class
28 Members.

1 5. Furthermore, there is no conflict between my interests and the interests of the class
2 that I am seeking to represent. My interests are entirely coextensive with the interests of the Class. I
3 allege that I was injured by the same company-wide policies and practices to which the proposed
4 Class was subjected and seek the same relief. I have already demonstrated my ability to advocate
5 for the interests of the Class by initiating this litigation, undertaking extensive class discovery, and
6 evaluating the proposed settlement to assure that it is fair.

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

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

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

25 ///

26 ///

27 ///

28 ///

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 April 17, 2026 at Corona, California.

4
5 

6 _____
Gabriel Rodriguez