

FILED
Superior Court of California,
County of Solano
02/23/2026 at 04:50:04 PM
By: J. Castaneda, Deputy Clerk

EVAN S. GAINES, ESQ. SBN 287668
GAINES LAW CORPORATION
4550 E. Thousand Oaks Blvd., Suite 100
Westlake Village, CA 91362
Telephone: (805) 892-8200
Facsimile: (805) 800-8928
evan@gaines.law

Attorneys for Plaintiff Gustavo Gonzalez,
on behalf of himself and all “aggrieved employees”
pursuant to Labor Code § 2698 *et seq.*

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SOLANO

\$20.00

GUSTAVO GONZALEZ, on behalf of
himself and all “aggrieved employees”
pursuant to Labor Code § 2698 *et seq.*,

Plaintiff,

v.

ROJAS FARM LABOR CONTRACTING, a
California corporation, HARDIN VINEYARD
MANAGEMENT LLC, a California limited
liability company, and DOES 1 through 10,
inclusive,

Defendants.

CASE NO: CU23-05829

Assigned to the Honorable Wendy Getty,
Dept. 8

**STIPULATION AND [PROPOSED]
ORDER DISMISSING
REPRESENTATIVE PRIVATE
ATTORNEYS GENERAL ACT ACTION**

[Labor Code § 2698 *et seq.*]

[Filed Concurrently with Declaration of Evan
S. Gaines]

Complaint Filed: December 8, 2023

STIPULATION

WHEREAS, on December 8, 2023, Plaintiff on behalf of himself and on behalf of all aggrieved employees filed a representative complaint against Defendants ROJAS FARM LABOR CONTRACTING, a California corporation, HARDIN VINEYARD MANAGEMENT LLC, a California limited liability company (collectively, “Defendants”), pursuant to the Labor Code Private Attorneys General Act of 2004 (“PAGA”), Labor Code § 2698 et seq., seeking civil penalties for violations of the California Labor Code (Declaration of Evan S. Gaines [“Gaines Decl.”], ¶ 2);

WHEREAS, after a review of the claims and defenses to the Action, and considering Defendants’ contentions that Plaintiff has been paid all wages due and owing and maintains claims that are individual to the other Aggrieved Employees, Plaintiff’s Counsel has concluded that it is in all Parties’ best interest to resolve Plaintiff’s individual claims only (Gaines Decl., ¶ 3);

WHEREAS, the Parties have negotiated a settlement of Plaintiff’s individual claims only, and the representative PAGA claims will be dismissed *without* prejudice (the “Settlement”) (Gaines Decl., ¶ 4);

WHEREAS, the Settlement between Plaintiff and Defendants does not contemplate the waiver of any claims by anyone other than Plaintiff and does not provide for the waiver of representative PAGA claims asserted on behalf of any employee or the state, such that there is no allocation of civil penalties in the Settlement. (Gaines Decl. ¶ 5);

WHEREAS, concurrent to the filing of this Stipulation, the Parties have submitted the Settlement Agreement to the Labor and Workforce Development Agency in compliance with Labor Code section 2699(1)(2) (Gaines Decl. ¶ 6); and

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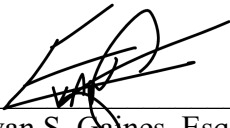
1 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties hereto
2 and through their respective attorneys of record that Plaintiff's individual claims shall be dismissed
3 with prejudice, the claims of all allegedly aggrieved employees shall be dismissed without
4 prejudice, and the Court shall retain jurisdiction pursuant to Code of Civil Procedure Section 664.6
5 with respect to all matters related to the consummation of the settlement, including to enforce the
6 Settlement.

7 **IT IS SO STIPULATED.**

8 Dated: February 20, 2026

9 For Plaintiff Gustavo Gonzalez:

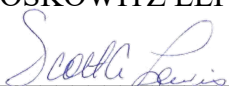
10 GAINES LAW CORPORATION

11 By:  _____

12 Evan S. Gaines, Esq.

For Defendants Rojas Farm Labor
Contracting and Hardin Vineyard
Management LLC

PERRY, JOHNSON, ANDERSON, MILLER
& MOSKOWITZ LLP

13 By:  _____

14 Scott A. Lewis, Esq.

ORDER

The Court, having reviewed the Parties' stipulation and any and all supporting papers, hereby ORDERS that:

1. The action is hereby DISMISSED WITH PREJUDICE as to Gustavo Gonzalez' individual claims, and DISMISSED WITHOUT PREJUDICE as to the representative claims under PAGA asserted on behalf of all allegedly aggrieved employees; and

2. The Court shall retain jurisdiction pursuant to Code of Civil Procedure Section 664.6 with respect to all matters related to the consummation of the settlement, including to enforce the Settlement.

IT IS SO ORDERED.

02/23/2026

Dated: _____



JUDGE OF THE SUPERIOR COURT

1 **PROOF OF SERVICE AND CERTIFICATION**

2 I am employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the
3 action. My business address is 4550 E. Thousand Oaks Blvd., Suite 100 Westlake Village, CA 91362.

4 _____ (For messenger) my business address is:

5 On February 23, 2026, I served the foregoing document described as **STIPULATION AND**
6 **[PROPOSED] ORDER DISMISSING REPRESENTATIVE PRIVATE ATTORNEYS GENERAL ACT**
7 **ACTION** the interested parties in this action by placing a true copy thereof enclosed in sealed envelopes addressed as
8 follows:

9 **SCOTT A. LEWIS, ESQ.**
10 **REGAN V. MASI, ESQ.**
11 **PERRY, JOHNSON, ANDERSON, MILLER & MOSKOWITZ LLP**
12 **438 First Street, 4th Floor**
13 **Santa Rosa, CA 95401**

14 On the above date:

15 _____ (BY x U.S. MAIL/ BY ☐ CERTIFIED MAIL, RETURN RECEIPT REQUESTED) The sealed envelope was
16 mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing
17 correspondence for mailing. It is deposited with United States postal service on that same day in the ordinary course
18 of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or
19 postage meter date is more than one day after date of deposit for mailing in affidavit.

20 X (BY ELECTRONIC SERVICE) The above-stated document was submitted for service by
21 electronic transmission via email on the counsel of record listed above.

22 X (UPLOADED TO LWDA WEB PORTAL) I caused the above-described documents to be delivered to
23 the Labor & Workforce Development Agency via online process at the PAGA Filing website (www.dir.ca.gov)
24 in accordance with the procedure imposed by the LWDA.

25 I certify that the above document was printed on recycled paper.

26 I declare under penalty of perjury that the foregoing is true and correct.

27 Executed on February 23, 2026, at Westlake Village, California.

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EVAN S. GAINES, ESQ.