

Miriam L. Schimmel (State Bar No. 185089)
 mschimmel@blackstonepc.com
 Joana Fang (State Bar No. 309623)
 jfang@blackstonepc.com
 Alexandra Rose (State Bar No. 329407)
 arose@blackstonepc.com
BLACKSTONE LAW, APC
 8383 Wilshire Boulevard, Suite 745
 Beverly Hills, California 90211
 Tel: (310) 622-4278 / Fax: (855) 786-6356

Attorneys for Plaintiff GABRIELA GUERRERO,
 individually, and on behalf of other similarly situated employees
 and aggrieved employees pursuant to the California
 Private Attorneys General Act

[Additional counsel listed on next page]

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

GABRIELA GUERRERO, OSMIN
 CHAVARRIA MEJIA, ELMER
 CHAVARRIA MEJIA, RAFAEL
 MENJIVAR CASTELLANOS, individually,
 and on behalf of other similarly situated
 employees and aggrieved employees pursuant
 to the California Private Attorneys General
 Act,

Plaintiffs,

vs.

SAR CALIFORNIA HOLDCO INC. DBA
 SARKU JAPAN, a California corporation;
 and DOES 1 through 25, inclusive,

Defendants.

Case No.: BCV-23-104255

Honorable Thomas S. Clark
 Department 17

**DECLARATION OF ELMER CHAVARRIA
 MEJIA IN SUPPORT OF MOTION FOR
 FINAL APPROVAL OF CLASS ACTION
 AND PAGA SETTLEMENT, ATTORNEYS'
 FEES AND COSTS, ENHANCEMENT
 AWARDS, AND SETTLEMENT
 ADMINISTRATION COSTS**

Date: July 29, 2026
 Time: 8:30 a.m.
 Dept: 17
 Address: 1415 Truxton Ave.
 Bakersfield, CA 93301

Complaint Filed: December 26, 2023
 FAC Filed: November 6, 2025
 Trial Date: Not Set

D.LAW, INC.

Roman Shkodnik (SBN 285152)

r.shkodnik@d.law

Amanda Fazio (SBN 346350)

a.fazio@d.law

Enoch J. Kim (SBN 261146)

e.kim@d.law

Arianna N. Razi (SBN 356930)

a.razi@d.law

250 N. Madison Ave., 2nd Floor

Pasadena, CA 91101

Telephone: (818) 962-6465

Facsimile: (818) 962-6469

Attorneys for Plaintiffs OSMIN CHAVARRIA MEJIA,

ELMER CHAVARRIA MEJIA, and RAFAEL MENJIVAR

CASTELLANOS on behalf of themselves and others similarly situated

DECLARATION OF ELMER CHAVARRIA MEJIA

I, Elmer Chavarria Mejia, declare as follows:

1. I am a competent adult, over the age of eighteen, and one of the class representative Plaintiffs in the matter *Gabriela Guerrero et al. v. SAR California Holdco Inc. dba Sarku Japan*. The following declaration is based on my personal knowledge and, if called as a witness, I could and would competently testify thereto.

2. I worked for Defendant from approximately April 2021 to February 2023 as a non-exempt employee. I worked in Defendant's facility located in Salinas, California.

3. I am familiar with the work involved in prosecuting the Class Action against my former employer SAR California Holdco Inc. dba Sarku Japan ("Defendant"). I am familiar with the claims made, the mediation proceedings, and settlement discussions, and have participated in all stages of the litigation up to and including preparation for final approval of the Settlement on behalf of the Class.

4. When I worked for Defendant, I was subjected to the same Labor Code claims involving off the clock work, meal breaks, rest breaks, expense reimbursement, wage statements, and failure to pay all wages due as the other Class Members.

5. I have and will continue to adequately represent the interests of all members of the proposed Class I seek to represent. My claims are typical of these Class Members and involve the same common issues. I have no interests that are inconsistent with any of these Class Members.

6. I have always considered the interests of the other Class Members just as I have my own interests and understand that I must put the interests of the other Class Members before my own. I have participated, and will continue to participate, in this lawsuit up to and through the time of judgment. I have volunteered to represent the other Class Members because of the importance of the case and so that other Class Members can benefit from the enforcement of the law and the savings of time, money, and effort that come from settling this case on a class basis.

7. I believe that the Settlement obtained on behalf of the Class is fair and reasonable in view of the issues and risks involved with the case.

8. I have spent approximately **30 hours** on this case. This includes the initial time I spent

1 investigating these claims and all work for this litigation, which has lasted over two years, meeting
2 with my attorneys, the mediation preparation and participating in mediation, and all follow-up work
3 with my attorneys. I believe I have been diligent and acted above and beyond that which is expected
4 of a class representative throughout all stages of the litigation and will continue to do so up to and
5 including final approval of the settlement.

6 9. Furthermore, it is my opinion that the enhancement award is fair and reasonable
7 because in addition to the many hours spent participating in this case, I accepted the potential risk of
8 being liable for the opposing party's costs if we were unsuccessful in this lawsuit.

9 10. I signed a general release, so I am not only giving up my wage and hour claims, but I
10 am also giving up any and all potential claims I had against my former employer in order to help
11 secure the Settlement on behalf of the Class.

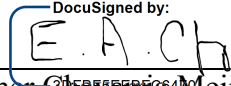
12 11. This decision posed other risks for me, too, and I did not make the decision to become
13 involved in this class action lightly. I was concerned about the attention a publicly filed lawsuit, and
14 especially a class action, would attract. My name would be associated with a lawsuit that I filed
15 against my employer. I was aware that it is possible, and relatively easy, to perform background
16 checks of publicly filed documents on the internet. I was mindful that prospective employers might
17 find out that I sued a former employer, and that this could hurt my employability in the future. I
18 believed in this case and was willing to be a class representative knowing the risks involved.

19 12. This litigation has also resulted in a valuable benefit to the Participating Class
20 Members who will participate in the monetary payout of this Settlement because of my involvement.
21 I have been advised by my attorneys that **the average Individual Settlement Payment to a**
22 **Participating Class Member will be approximately \$406.50, and the highest Individual**
23 **Settlement Payment will be approximately \$851.74.** This is a great benefit to all Participating Class
24 Members. Further, the requested enhancement award of \$10,000.00 is only approximately **2.49%** of
25 the Gross Settlement Amount obtained on behalf of all Class Members.

26 13. Based on the foregoing, I believe that the requested enhancement award is fair and
27 reasonable. As such, I respectfully request that the Court award the requested class representative
28 Enhancement Award of \$10,000.00.

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

3 Executed this 16 day of June 2026, at Salinas, California.

4 DocuSigned by:
5 
6 Elmer Chavarria Mejia
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28