

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

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF LOS ANGELES**

11
12 JONATHAN COLQUITT, SR., an individual
and on behalf of all others similarly situated;

13 Plaintiff,

14 vs.

15 GOLDEN STATE FOODS CORP., a
16 Delaware corporation; and DOES 1 through
17 50,

18 Defendants.

Case No.: 23STCV29902

[Assigned for All Purposes to:
Hon. Timothy Patrick Dillon, Dept. 15]

**DECLARATION OF JONATHAN
COLQUITT, SR. IN SUPPORT OF
MOTION FOR APPROVAL OF PAGA
SETTLEMENT**

(Filed concurrently with Motion for Approval
of PAGA Settlement; Supporting
Declarations; and [Proposed] Order)

DATE: March 25, 2026

TIME: 11:00 a.m.

DEPT: 15

Action Filed: December 7, 2023

Trial Date: Not Set

1 I, Jonathan Colquitt, Sr., 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 Golden State Foods Corp. ("Defendant") as an hourly-
7 paid, non-exempt employee from approximately May 2002 to July 29, 2024 as a bulk receiver at
8 Defendant's City of Industry distribution center. During my employment with Defendant, I was
9 subject to Defendant's wage and hour policies and practices that are at issue in this case.

10 3. Specifically, I frequently worked off the clock during my meal break and after I
11 clocked out without pay, I frequently was unable to take compliant meal and rest breaks because of
12 my workload, and I received incentive compensation such as shift differentials, which I believe was
13 not factored into the regular rate pay, and I had to use my personal cellphone for work because
14 Union Pacific would call me on my cellphone. As a result of the foregoing issues, I believe I
15 received inaccurate wage statements and was not paid all wages when my employment with
16 Defendant ended. I believe other non-exempt employees of Defendant were subject to the same
17 policies and procedures discussed above and that my claims against Defendant for unpaid wages
18 and statutory and civil penalties are typical of Class Members' claims.

19 4. I have been actively involved in this case since I first retained Justice for Workers,
20 P.C. ("JFW") in December 2023. Without waiving the attorney-client privilege, prior to filing this
21 lawsuit, my attorneys explained my role and responsibilities as a PAGA Representative, and I
22 understand my responsibilities as a PAGA Representative. Since retaining my attorneys, I have had
23 many discussions and meetings with the attorneys and staff at JFW, discussions regarding
24 Defendant's wage and hour practices and my claims in this case, litigation strategy, updates on how
25 the case was proceeding, the Settlement, and how I could help the case and potential Aggrieved
26 Employees. I also gathered and reviewed documents for use in the lawsuit and reviewed relevant
27 documents with my attorneys.

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

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

17 7. I do not have any conflict of interest with the proposed Administrator, Apex Class
18 Action LLC.

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

21 Executed on January 17, 2026 at Hesperia, California.

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23 

24 _____
Jonathan Colquitt, Sr.