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

Ferry Mendoza, individually and on behalf of
all similarly situated individuals,

Plaintiff,

vs.

Baughner Ranch Organics, Inc., a
California Corporation; and **Does 1-10**,
inclusive;

Defendants.

CASE NO. 25CV00036

(Assigned to The Hon. Alicia Ekland; Dept 2)

CLASS ACTION

**DECLARATION OF FERRY MENDOZA
IN SUPPORT OF MOTION FOR:**

**(1) PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT;**

**(2) APPROVAL OF NOTICE TO CLASS
MEMBERS AND RELATED
MATERIALS; AND**

**(3) SETTING HEARING FOR FINAL
APPROVAL OF SETTLEMENT**

Date: July 2, 2025

Time: 2:30 p.m.

Dept.: 2

1 Complaint; reviewing relevant documents, the Complaint, and this declaration; participating in phone
2 calls meetings with Class Counsel to discuss litigation and settlement strategy; participating in mediation
3 preparation; remaining readily available during mediation; reviewing the settlement documents; and
4 putting Class Counsel in touch with other Class Members. I agreed to participate in this case with no
5 guarantee of personal benefit.

6 9. This case also involved risks to me personally, such as the potential risk of having to pay
7 costs in the case if we lost and the risk of negative publicity by or to anyone who opposed this case. This
8 litigation was also lengthy. I have been involved in this case—seeking to obtain a benefit for the Class—
9 for nearly a year all with no assurance that I would recover any personal benefit.

10 10. Indeed, outside the incentive award and my share of the class recovery, I have received
11 no personal benefit for my work and I am not receiving any consideration for my participation in this
12 Settlement other than my requested service award and pro rata share of the Settlement.

13 11. Even in the face of these risks, I pursued this case on behalf of the Class because I
14 believe in it, and we reached a successful resolution and settlement.

15 12. I was happy to learn that the case settled on behalf of the Settlement Members for the
16 amount of \$265,000.00. I believe this is a very positive result, and glad that my efforts helped other
17 employees to benefit and obtain vindication for the Labor Code violations they suffered.

18 13. I understand that class representatives are eligible for compensation for their efforts as
19 a named plaintiff in an action. I respectfully request that the Court preliminarily grant an award to me in
20 the amount of \$7,500, in addition to my pro rata share of the Settlement fund.

21 14. Based on the strong result obtained for the Class, I, along with my counsel, believe this
22 is a fair and appropriate award. I am prepared, and will provide, a detailed accounting of my hours spent
23 assisting in the litigation as part of the Motion for Final Approval.

24 15. I respectfully ask that the Court grant final approval of this Settlement and grant my
25 request for a service award.

26 16. I am not currently, nor have I ever been, a Named Plaintiff in any other PAGA
27 Representative case, pending or closed.

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

3
4 Executed on May 22, 2025 in the county of Glenn, California.

5
6 By: 
Ferry Mendoza

