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10
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF SAN LUIS OBISPO**
13

14 Coordination Proceeding Special Title
(Rule 3.550)

15 **WINESHIPPING WAGE AND HOUR**
16 **CASES**

17 Included actions:

18 Diaz Flores v. Wineshipping.com, LLC, et al.
19 Wentz v. Wineshipping.com, LLC, et al.
20 Wentz v. Wineshipping.com, LLC, et al.

JUDICIAL COUNCIL COORDINATION
PROCEEDING NO. 5392

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN LUIS OBISPO NO.
23CVP-0321

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SOLANO NO. CU24-00354

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SOLANO NO. CU24-02101

21 **DECLARATION OF STAN S. MALLISON**
22 **DIAZ IN SUPPORT OF PLAINTIFFS'**
23 **MOTION FOR PRELIMINARY**
24 **APPROVAL OF CLASS ACTION AND**
25 **PAGA SETTLEMENT**

26 Date: 3-16-2027
27 Time: 9 AM
28 Dept.: P2

ELECTRONICALLY

FILED

9/4/2026 6:19 PM

SAN LUIS OBISPO SUPERIOR COURT
BY 
Julie Vierra, Deputy Clerk

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I, Stan S. Mallison, declare:

1. I am an attorney at law licensed to practice before all courts of the State of California and am a founding partner of Mallison & Martinez. My firm and I are counsel for Plaintiff in the above-entitled case. I am familiar with the above-captioned litigation and the dispute from which it arises. All statements made herein are based on personal knowledge unless otherwise stated. If called as a witness, I could competently testify as to matters stated herein.

Mallison & Martinez Firm Description

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- 1 a. ABM Industries Overtime Cases (San Francisco Superior Court): This is a
2 class action involving some 50,000 janitorial workers in California. The
case settled for \$140 million.
- 3 b. In re: Rhodia ERISA Litigation (Southern District of New York): This was
4 an ERISA Class Action on behalf of 3,945 workers of Rhodia, Inc.
Appointed Co-lead Counsel with Robbins Umeda & Fink. (Class
5 settlement approved for \$2.4 million).
- 6 c. In re Milgard (Los Angeles County Superior Court): This was a wage and
hour class action on behalf of approximately 1,000 factory workers. (Class
7 Settlement of \$5 million approved).
- 8 d. Ibañez et al. v. Food Specialists Inc. et al. (Alameda County Superior
Court - Complex): This was a class action wage and hour case on behalf of
9 950 food service employees of Scott's Seafood Restaurants. (Class
settlement approved for \$1.485 million).
- 10 e. Korbel Winery (Eastern District of California): This was a mid-sized wage
and hour class action case involving approximately 600 winery workers.
11 (Class settlement approved for \$750,000).
- 12 f. Miranda et al. v. Don Roberto Jewelers (Santa Barbara County Superior
Court): This was a retail worker's wage and hour class action involving
13 approximately 1,400 retail workers. (Class settlement granted final
approval for \$1.225 million).
- 14 g. Morales v. Stevco, Inc. (Eastern District of California): This was a mid-
sized wage and hour class action settlement for grape field workers.
15 (\$925,000 settlement granted final approval).
- 16 h. Glenn Block v. eBay, Inc. (Santa Clara County Superior Court): This was a
consumer class action case filed on behalf of numerous eBay consumers
17 who were impacted by eBay's "bid against yourself" policy (co-counsel
Lerach Coughlin Stoia Geller Rudman & Robbins). (Class settlement
18 approved for \$2.1 million).
- 19 i. Benitez et al. v. Wilbur et al. (Eastern District of California): This was a
class action wage and hour case on behalf of a class of dairy workers who
20 were (1) not paid all wages largely due to being paid a fixed salary without
regard to actual hours worked and (2) due to the employer's failure to
21 record time. (\$400,000 settlement granted final approval).
- 22 j. MAT Landscape (San Joaquin County Superior Court): This was a mid-
sized wage and hour case involving hundreds of landscape workers.
23 Mallison & Martinez co-counseled with California Rural Legal
Assistance, Inc. (Settlement for \$700,000 approved).
- 24 k. Vasquez v. Coast Roofing (Eastern District of California): This was a mid-
sized wage and hour class action case involving hundreds of roofing
25 workers. (Class settlement for \$250,000 granted final approval).
- 26 l. Rodriguez v. DM Camp (Eastern District of California): This was a mid-
sized wage and hour class action settlement for grape field workers.
27 (\$675,000 settlement granted final approval).
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- 1 m. Zacapa v. Don Roberto (Santa Barbara County Superior Court): This was
2 a wage and hour class action involving approximately 1,000 retail
workers. (Class settlement granted final approval for \$875,000).
- 3 n. TBS Couriers (Alameda County Superior Court): This was a set of two
4 mid-sized wage and hour class action cases involving hundreds of delivery
drivers. Mallison & Martinez is counsel in these coordinated actions (trial
5 judgment awarded for more than \$4.7 million).
- 6 o. Lara et al. v. Sierra La Verne Country Club (Los Angeles County
7 Superior Court): This was a mid-sized wage and hour class action on
behalf of service workers. Mallison & Martinez is originating counsel and
8 co-counseled the case with Rastegar & Mattern. (\$725,000 class
settlement approved).
- 9 p. La Perla Tapatia (Eastern District of California): This was a wage hour
class action on behalf of grocery workers. (Class settlement granted final
10 approval for \$400,000).
- 11 q. Rosales v. El Rancho; Cruz, et al. v. El Rancho (Eastern District of
California): This was a wage and hour class action on behalf of grape
workers. (Final approval granted for settlement of \$2.3 million).
- 12 r. Ontiveros v. Zamora (Eastern District of California): This was a wage and
13 hour class action on behalf of a class of mechanics involving failure to pay
minimum wage and overtime. (\$2.2 million class settlement approved).
- 14 s. Jacobo v. Packaging Plus Wage and Hour Class Action (San Benito
15 County Superior Court): This was a wage and hour class action on behalf
of a class of produce packing workers involving rest and meal period
16 violations. (\$4.5 million class settlement approved).
- 17 t. Rojas et al. v. Sunview Vineyards (Eastern District of California): This
was a large wage and hour class action on behalf of approximately 10,000
18 fieldworkers. (Class settlement of \$4.55 million approved).
- 19 u. Larios v. Piatti Restaurants (Marin County Superior Court): Final
20 approval granted for wage and hour class action settlement for \$2.5
million involving thousands of restaurant workers throughout the state of
California.
- 21 v. Munoz v. Giumarra Vineyards (Eastern District of California): This was a
22 large wage and hour class action on behalf of approximately 15,000
fieldworkers. (Class settlement of \$6.1 million plus interest granted final
23 approval).
- 24 w. Morales et al. v. Leggett & Platt, Inc. et al. (Eastern District of
25 California): This was a wage and hour class action on behalf of
approximately 370 employees who worked at Defendants' manufacturing
26 facilities. (Final approval granted for settlement of \$1.75 million.)
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1 5. The above listing is just a sample of the more than 200 wage and hour class and
2 representative action cases that Mallison & Martinez has been involved with since forming in
3 2005.

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5 **Current Attorneys on the Case**

6 6. I, Stan Mallison, am a former meat cutter and baker. I received my Bachelor of
7 Arts degrees in Philosophy and Political Science from the California Polytechnic University at
8 Pomona, California in 1990, graduating *magna cum laude* and first in both departments. I earned
9 my Master's degree in Economics from the University of California at Riverside in 1993, where
10 I had been admitted to, and substantially progressed through, the Economics Ph.D. program. I
11 earned my law degree from Stanford University in 1996, graduating with honors. During law
12 school, I interned with the National Labor Relations Board ("NLRB"), both at the Division of
13 Judges in San Francisco as well as under the direct supervision of Chairman of the NLRB
14 William B. Gould in Washington D.C.

15 7. Between 1996 and 1998, I worked in complex labor and employment litigation
16 for the law firm of Van Bourg, Weinberg Roger and Rosenfeld, the largest union-side labor law
17 firm in the country. From 1998 to 2004, I worked for Milberg Weiss Bershad Hynes & Lerach
18 ("Milberg Weiss") and joined Lerach Coughlin Stoia & Robbins ("Lerach Coughlin") when the
19 Milberg firm divided in 2004, working there until February 2005. My work at Milberg Weiss
20 and Lerach Coughlin consisted of class action work and included work on complex and large
21 cases including: *In Re Enron Securities Litigation* (\$7.2 billion settlement); *Mariana Island*
22 *Garment-Worker Cases* (a \$20 million wage and hour settlement on behalf of 20,000 migrant
23 workers on the island of Saipan); *In Re 3Com Securities Class Action* (\$259 million settlement),
24 a federal court challenge to the sufficiency of the federal Department of Transportation's
25 NAFTA truck safety regulations; *In re Pemstar Securities* (settlement of \$12 million); *In re*
26 *Block v. eBay* (settlement of \$2.1 million); a federal court challenge to Presidential Executive
27 Order re: Project Labor Agreements, and dozens of other cases. As a result of my expertise in
28 economics, I devised and developed the Black-Scholes valuation method of analyzing insider

1 option exercises. I spent a considerable amount of my time at Milberg Weiss and Lerach
2 Coughlin as liaison to economic experts.

3 8. Hector Martinez received his Bachelor of Arts degree in Political Science in 1993
4 from the University of California at Davis. Mr. Martinez grew up in a farm labor camp among a
5 socially conscious farm-worker community, which motivated Mr. Martinez to work for the
6 benefit of low-wage workers. Beginning in the mid-nineties, at the California Institute for Rural
7 Studies, Mr. Martinez conducted extensive research on California's agricultural industry and the
8 substandard environmental, health and working conditions and their impact on farmworkers and
9 their families. Mr. Martinez then attended law school and earned his law degree from Golden
10 Gate University School of Law in 1998. During law school, he worked as a law clerk with Van
11 Bourg, Weinberg, Roger and Rosenfeld, the largest union-side labor law firm in the country,
12 under the direct supervision of named partner David Rosenfeld. From 1999 to 2004, Mr.
13 Martinez worked at California Rural Legal Assistance, Inc. ("CRLA"), the largest non-profit law
14 firm dedicated to farm-worker issues in the country. His work at CRLA included numerous
15 representative PAGA actions under California's Unfair Competition Law, Business &
16 Professions Code Sections 17200 *et seq.*, which were brought on behalf of thousands of
17 agricultural employees and the general public. During his time with CRLA, Mr. Martinez was
18 nominated for and received a fellowship with the California Wellness Foundation Violence
19 Prevention Initiative, for his work with farm-worker youth throughout California.

20 9. Cody A. Bolce is an associate at Mallison & Martinez and is admitted to practice
21 in California State Courts, all four federal district courts in California, and the Ninth Circuit
22 Court of Appeals. He received his Bachelor of Science degree in Political Science from the
23 University of Oregon and his Juris Doctorate from Santa Clara University School of Law. He
24 was admitted to the California State Bar in 2018. While in law school, he clerked in the Civil
25 Division of the United States Attorney's Office where he developed an interest in employment
26 law. Prior to joining Mallison & Martinez, he was a Senior Associate at Cole & Van Note where
27 he represented employees and consumers in class actions in state and federal courts nationwide.

10. Mallison & Martinez has had, and continues to have, adequate resources to vigorously litigate this case on behalf of the class representative and class members. Plaintiff's counsel has spared no expense nor taken any shortcuts in this litigation.

11. Neither I nor any member of the firm has any personal affiliation or family relationship with the Plaintiff. The only relationship with Plaintiff in this current litigation is the attorney-client relationship. The firm chose the class representative because we believed he provided a good representation of the breadth of the class. The class representative has carried out all required tasks in this case to help us pursue this action, providing us with information, documents, insights, opinions, and necessary decisions to make this case successful. The class representative spent considerable time in his efforts on behalf of the class and deserves the incentive award requested in this case.

12. In accordance with California Labor Code section 2699(s)(2), on August 28, 2026, a copy of the proposed Settlement was submitted to the LWDA via online submission through the LWDA's website.

13. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 3, 2026, in Mendocino, California.


Stan S. Mallison