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Attorneys for Plaintiff

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

GREGORY MEADE, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

PUMPKIN CITY'S PUMPKIN FARM INC., a
California corporation; and DOES 1 through
100,

Defendants.

Case No. 30-2024-01382083-CU-OE-CXC

*[Case assigned for all purposes to the Hon.
Randall J. Sherman, Dept. CX105]*

**DECLARATION OF JOSEPH
TOJARIEH IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: January 24, 2025
Time: 10:00 a.m.
Dept.: CX105
Reservation ID No.: 74397982

Action Filed: February 27, 2024
Trial Date: None Set

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1. I graduated *summa cum laude* from the Honor's College of the University of California, Los Angeles (UCLA) with a Bachelor of Arts degree in Political Science and History. I subsequently received my Juris Doctor degree from Loyola Law School, Los Angeles, where I served as a staff member and Senior Note and Comment Editor of the Loyola Law School International Law Review.

3. I am duly licensed to practice before all state courts in California, all United States District Courts in California, all United States Bankruptcy Courts in California, and the United States Supreme Court. I am also an active member of the Consumer Attorneys Association of Los Angeles (CAALA) and California Employment Lawyers Association (CELA).

Mohorne v. Church & Dwight Co., Inc. (LASC Case No. BC569117); *Lopez v. Aerotek, Inc.* (USDC CACD Case No. SACV 14-00803-CJC(JCGx)); *Silva v. ADJ Products* (LASC Case No. BC618581); *Hernandez v. Downey Wholesale, Inc.* (SBSC Case No. CIVDS1821370); *Walters v. Los Angeles County Fair* (SBSC Case No. CIVDS1825109); *Patton v. Midwest Construction Services, Inc.* (CACD Case No. 2:19-cv-08580-JFW-MAAx); *Fontenette v. Special Services for Groups, Inc.* (LASC Case No. 19STCV46726); *Basich-Mustafa v. Designer Fragrances & Cosmetics Company* (LASC Case No. 20STCV16314); *Miller v. Mountain High Reunited LLC* (SBSC Case No. CIVDS2010045); *Jones v. Peace Over*

1 *Violence, et al.* (LASC Case No. 20STCV39038); *Tam v. Q Tech Corporation* (LASC Case No.
2 21STCV18635; *Ramirez v. Baxalta US, Inc.* (Los Angeles Superior Court Case No.
3 21STCV07572); *Celio v. Air International US, Inc.* (Alameda Superior Court Case No.
4 RG21098764); and *Hang v. Old Dominion Freight Line, Inc.* (CACD Case No. 5:21-cv-00287-
5 JWH-KKx).

6 5. I am very familiar with employment law relating to class actions, their dynamics,
7 and also the risks inherent in litigating a class action through certification and trial. I have the
8 resources, experience, and expertise necessary to protect fully and fairly the interests of the
9 proposed class.

10 6. My office invested time and resources into this case, with payment contingent on
11 the outcome of this case and deferred until the end of this case. The efforts of my firm have
12 resulted in benefits to class members, allowing them to receive compensation for the alleged
13 illegal wage and hour practices. Without the efforts of my firm, the claims at issue in this case
14 may have gone without remedy.

15 7. The efforts of our office include, without limitation, interviewing Plaintiff and
16 reviewing documents he provided; investigating Defendant's alleged violations of California
17 wage and hour laws; researching theories of liability for the alleged violations; investigating the
18 nature of Defendant's business, prior lawsuits, and business operations; and drafting and
19 mailing to Defendant a letter requesting employment records pursuant to Labor Code sections
20 1198.5, 432, and 226(b); researching similar class action cases; communicating with Plaintiff
21 throughout the litigation process; and communicating with co-counsel regarding strategies to
22 take towards case resolution.

23 8. Based on my experience with wage and hour class actions, I believe the proposed
24 settlement is fair, reasonable, and adequate. By reaching a settlement, the risk that this Court
25 may deny class certification is eliminated. Moreover, additional litigation will delay resolution
26 of class members' claims and may even reduce the amount of money they recover. The
27 uncertainties of litigation and trial are endless. There is no guarantee that class members will
28

1 receive any money should the parties continue to litigate this case. With the settlement, class
2 members receive a certain and immediate recovery with an opportunity to opt-out of the
3 settlement if for any reason they are not satisfied. Further, while Plaintiff is confident in the
4 merits of his case, Defendant has legitimate arguments as to each cause of action, as explained
5 in detail in the Motion for Preliminary Approval. In sum, in light of the obstacles inherent in
6 class actions, Defendant's defenses, and the time, expense, and risks of litigation, the settlement
7 represents a reasonable compromise and a good result for class members.

8 I declare under penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct. Executed on September 30, 2024 at Los Angeles, California.
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11 STONEBROOK LAW

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14 By: _____

15 JOSEPH TOJARIEH
16 Attorney for Plaintiff
17 GREGORY MEADE
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