

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Fletcher W. Schmidt (SBN 286462)
fschmidt@haineslawgroup.com
Matthew K. Moen (SBN 305956)
mmoen@haineslawgroup.com
Aden M. Khachadorian (SBN 346908)
akhachadorian@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

STONEBROOK LAW
Joseph Tojarieh (SBN 265492)
10250 Constellation Boulevard, Suite 100
Los Angeles, California 90067
Tel: (310) 553-5533 | Fax: (310) 553-5536
jft@stonebrooklaw.com

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 GREGORY MEADE
IN SUPPORT OF APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: January 24, 2025

Time: 10:00 AM

Dept.: CX105

Reservation Number: 74397982

Action Filed: February 27, 2024

Trial Date: None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

I, GREGORY MEADE, declare as follows:

1. I am an individual over the age of 18 and the named plaintiff in this matter. This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Pumpkin City’s Pumpkin Farm Inc. (“Defendant”) as a non-exempt employee in the position of “Ride Handler” at Defendant’s Laguna Hills pumpkin patch location from approximately September through October 2023.

3. During my employment with Defendant, I frequently performed work both before and after the end of my scheduled shifts, including maintenance of the rides and/or waiting for other employees to cover my workstation. However, Defendant did not pay me for all of my time performing work, and instead only paid me for my scheduled shift. Defendant told me that this off the clock work was considered "charity," and I would not get paid for the work I performed during these times. Further, the rides I operated could not be left unattended, and therefore Defendant required me to remain on duty until I was relieved by another employee. As a result, Defendant frequently failed to provide me with any meal periods, and I was frequently required to work through rest periods.

4. When I first filed my lawsuit, I understood that it had the chance to benefit Defendant's other workers by helping them recover money and penalties they were owed. I felt that Defendant was not following the law, and I wanted Defendant to comply with the law and treat its employees fairly. I feel that I have taken on a greater burden than any of the other class members because I have been actively involved in the litigation since it began, and because it is my name that is attached to the lawsuit. Although I was aware of the risks associated with filing a public lawsuit, I chose to move forward with the case anyway. Through my efforts, Defendant has agreed to a settlement that will benefit current and former employees of Defendant, and I believe that I should be compensated for carrying the burden of this litigation for the benefit of the other employees.

1 5. I have been actively involved in this case since before it was even filed. Among
2 other things, I searched for relevant documents for use in the lawsuit, provided factual
3 information to my attorneys, had many phone calls with my attorneys to discuss the claims in
4 the lawsuit and Defendant's practices, discussed the status of the case and general case strategy
5 with my attorneys on multiple occasions, provided valuable input to assist my attorneys in
6 preparing for mediation, made myself available for the full-day mediation that lead to this
7 settlement, reviewed and provided input regarding the settlement in this case, and otherwise
8 assisted my attorneys in moving this case towards resolution. I estimate that I have spent
9 approximately 15 hours in total on these activities.

10 I declare under penalty of perjury under the laws of the state of California and the
11 United States that the foregoing is true and correct. Executed on 09/12/24, 2024 at
12 Huntington Beach, California.


Gregory Meade (Sep 12, 2024 10:45 PDT)

Gregory Meade