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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF MONTEREY**

ADRIAN CUEVAS-GRANADOS and  
JUAN FERNANDO MERENDON-  
CEREGA, as individuals and on behalf of  
all other aggrieved employees,

Plaintiffs,

vs.

SABOR FARMS, LLC, a California limited  
liability company; and DOES 1 through 100,

Defendants.

Case No. 24CV000743

[*Unlimited Jurisdiction*]

**DECLARATION OF PLAINTIFF, JUAN  
FERNANDO MERENDON-CEREGA IN  
SUPPORT OF PLAINTIFFS' NOTICE  
OF MOTION AND MOTION FOR  
APPROVAL OF SETTLEMENT OF  
CLAIMS BROUGHT UNDER THE  
PRIVATE ATTORNEYS' GENERAL  
ACT AND REASONABLE  
ATTORNEYS' FEES, COSTS, AND  
ENHANCEMENT PAYMENTS**

Date: December 19, 2025

Time: 8:30 a.m.

Dept.: 14

Complaint filed: February 23, 2024

Trial Date: None Set

**DECLARATION OF JUAN FERNANDO MERENDON-CEREGA**

I, JUAN FERNANDO MERENDON-CEREGA, hereby declare as follows:

1. I am an individual over the age of 18 and a named Plaintiff in this matter. 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 submit this declaration in support of Plaintiffs' Notice of Motion and Motion For Approval Of Settlement Of Claims Brought Under the Private Attorneys' General Act And Reasonable Attorneys' Fees, Costs, And Enhancement Payments.

3. I was employed by Defendant, Sabor Farms. LLC ("Defendant") from approximately January 9, 2014 until April 27, 2023. I was classified as a non-exempt, hourly employee earning \$18.50 as of my separation from Defendant.

4. During my employment with Defendant, Defendant routinely failed to provide me with the opportunity to take timely, off-duty meal and rest breaks. I do not believe I was ever paid additional compensation for missing a meal or a rest break, or for my meal and rest breaks being on duty, late or interrupted. Additionally, I am informed and believe that Defendant failed to maintain accurate records of my time worked and provided me with inaccurate paystubs based upon Defendant's failure to provide me with all of my wages and meal and rest period premium payments when I received untimely meal periods or missed rest periods. I believe that other hourly, non-exempt employees ("Aggrieved Employees") similarly experienced these wage and hour issues as I did while working for Defendant.

5. In or about June of 2023, I decided to pursue this action against Defendant because I believed the treatment received was also affecting other employees. It was important to me that I bring this case on behalf of not only myself, but as well as our fellow employees.

6. During the meetings with my attorney, Scott Ernest Wheeler, I informed Mr. Wheeler regarding Defendant's policies and practices, and agreed to represent all other hourly, nonexempt employees in an action pursuant to the Private Attorneys General Act ("PAGA") who worked for Defendant and attempt to obtain penalties against Defendant for their California Labor Code violations. I agreed to consider the interests of the State of California and other Aggrieved

1 Employees in pursuing this action just as I would consider my own interests.

2 7. When I agreed to represent other non-exempt employees of Defendant, I  
3 understood it was my duty to be readily available and to participate actively in this case. I knew  
4 that I would be required to review documents, search for documents and produce them to my  
5 attorneys, answer questions, potentially answer oral questions and testify truthfully under oath,  
6 and be available to appear in Court, if necessary. I understood that I needed to maintain awareness  
7 of the status and progress of the lawsuit.

8 8. Before the formal commencement of this litigation, and throughout the course of  
9 the lawsuit, I cooperated with my attorney, Mr. Wheeler of The Wheeler Law Firm, APC, and took  
10 actions to protect the interests of the State of California and other Aggrieved Employees. I spent a  
11 significant amount of time consulting with my attorney in person and by phone, providing my  
12 attorney with relevant documents, reviewing relevant documents with my attorney, assisting my  
13 attorney in preparation of pleadings, participating in mediation and settlement discussions and  
14 other important decisions concerning the case, and keeping myself informed of the developments  
15 in the case even after a settlement was reached.

16 9. I understood it was my responsibility to actively participate in the lawsuit to  
17 safeguard the interests of other aggrieved employees, and to ensure that my interests were not in  
18 conflict with those of the other employees. I did so to the best of my ability, and I believe I have  
19 maintained the best interests of the State of California and other Aggrieved Employees. I have  
20 actively participated in this litigation and have been updated of the progress of the case. I have  
21 provided documents to Mr. Wheeler in support of the PAGA action and spent many hours  
22 discussing my claims and information regarding my employment by Defendant. I have also  
23 invested significant time and efforts in performing my duties on behalf of the other Aggrieved  
24 Employees, including during the initial complaint drafting process, in response to informal  
25 discovery before mediation, and in connection with the mediation and ongoing settlement  
26 negotiations, and now throughout the approval process.

27 10. I have spent a lot of time speaking with and exchanging emails with my counsel to  
28 receive answers to my questions or updates on the case progression. I estimate I have devoted

approximately at least **46.50 hours** of my time to this action and representing the interests of the State of California and other Aggrieved Employees, including by performing the following:

a. Researching the issues and claims I could bring against Defendant and talking to my attorneys about initiating this action;

b. Being interviewed in detail by my counsel regarding the working conditions we operated under for Defendant, and particularly my experiences and the policies and practices that applied to my employment and the employment of the other similarly situated employees;

c. Searching for and gathering every relevant documents in my possession and providing them to my attorneys, and reviewing all documents produced by Defendant;

d. Speaking with and informing my attorneys of the identities of potential witnesses and Aggrieved Employees and responding to questions from other aggrieved employees and counsel and from Defendant in preparation for mediation;

e. Preparing for mediation session and reviewing settlement related documents and working with counsel to prepare and provide executed final versions of the MOU and the Settlement Agreement; and

f. Regularly receiving and responding to correspondence and phone calls from Mr. Wheeler and sending many e-mails and taking and making calls regarding the claims and case status and then the Settlements and other related documents.

11. I have chosen to represent those who may be afraid to speak up because of fear of being fired or retaliated against. I also fear retaliation against me after the close of this case. I expect that wherever I work in the future, my employer and immediate supervisors will have heard of my involvement with this case. I expect the publicity surrounding this case to increase even further if the Court grants approval of the PAGA settlement. This guarantees that any prospective employer doing a simple internet search on me will learn of my role as an instigator of this lawsuit. Although they are not supposed to retaliate against me, I think the reality is that I may experience a certain stigma for years to come. I fear retaliation or other adverse consequences will arise in my future employment due to my decision to serve as a Plaintiff and decision to pursue this PAGA action.

1           12.     I took a huge risk by coming forward to help with this PAGA action. If I had lost  
2 the case and also been ordered to pay Defendant's litigation costs, it would have been financially  
3 devastating to me. In agreeing to a general release, I also understand that I am giving up other  
4 types of claims arising out of my employment that I believe to be meritorious. However, I also  
5 believe the settlement obtained on behalf of the aggrieved employees is fair and reasonable in  
6 view of the facts, claims and the risk of going through further litigation in this case.

7           13.     Further, prior to approving the filing of this action, I also realized I was taking a  
8 significant amount of risk in filing the PAGA action claims against Defendant. For example, I  
9 understood I might be responsible for the payment of Defendant's court-awarded litigation costs  
10 in the event I did not prevail in the litigation. Even though I understood that such costs would  
11 likely mean financial ruin for me personally, I still pressed forward with the litigation.

12           14.     I also knew that when I decided to search for employment outside of working for  
13 Defendant, any prospective employer may find out that I had sued my former employer for  
14 California Labor Code violations and was acting as a representative which may prevent future  
15 employment.

16           15.     Even though I knew I was taking risks, I knew I had to do what I believed was  
17 right and pursue claims on behalf of myself and other workers and attempt to recover penalties  
18 against Defendant based upon their Labor Code violations.

19           16.     To date, I have not suffered any adverse consequences that I am aware of as a  
20 result of the filing of this action.

21           17.     It is my opinion that the proposed PAGA settlement achieved is fair, adequate and  
22 reasonable.

23           18.     I have no actual or potential conflicts of interest with other current or former non-  
24 exempt employees of Defendant.

25           19.     I also feel my participation as one of the representatives in this representative  
26 action lawsuit could inhibit my ability to seek gainful employment in the future.

27           20.     To this date, I continue to regularly communicate with Mr. Wheeler about the  
28 progress of the case.

21. I am requesting the Court approve a \$5,000 service award. I believe this amount is very reasonable considering the significant amount of work, time and effort I have spent with my attorneys to achieve this settlement. The time and service I provided to the State of California and other Aggrieved Employees resulted in the parties agreeing to settle the case and is a positive outcome to the other Aggrieved Employees, who will receive a share of the settlement funds in this case.

22. I also believe the amount of the service award is very reasonable considering the financial and professional risks I took by bringing a PAGA lawsuit against my former employer, particularly in the difficult economy, and the risk of not prevailing in the lawsuit and being responsible for the payment of costs to Defendant.

23. I am committed to this case and will continue to make myself available as needed in the settlement process.

24. I understand my requested \$5,000 enhancement award is subject to the Court's final approval and discretion, and I respectfully request that the Court the requested award.

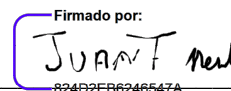
25. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as an enhancement award, as well as my share of the settlement fund as an aggrieved employee.

26. I further agreed that any fee award will be distributed as follows: 50% to The Wheeler Law Firm, APC, and 50% to the Haines Law Group, APC. Consistent with Rule 1.5.1 of the Cal. Rules of Prof. Conduct, I approved of this division in writing when myself and the other Plaintiff agreed to prosecute this action jointly.

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

11/9/2025

Executed on November \_\_\_\_, 2025, at ~~11/9/25~~ Salinas, California.

Firmado por:  


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JUAN FERNANDO MERENDON-CEREGA