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Attorneys for Defendants

LAGUNA COOKIE COMPANY INC. and

D.F. STAUFFER BISCUIT CO., INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF COUNTY OF ORANGE

OXENI JUAREZ DE LA CRUZ, AN
INDIVIDUAL AND ON BEHALF OF ALL
OTHERS SIMILARLY SITUATED,

Plaintiff,

vs.

LAGUNA COOKIE COMPANY INC., A
CALIFORNIA CORPORATION; D.F.
STAUFFER BISCUIT CO., INC., A
PENNSYLVANIA CORPORATION; AND
DOES 1 THROUGH 50,

Defendants.

CASE NO.30-2024-01381818-CU-OE-CXC

[Assigned for All Purposes to:
Hon. Melissa R. McCormick, Dept. CX105]

DECLARATION OF RON FINK

Action Filed: February 26, 2024

FAC Filed: April 29, 2024

Trial Date: None Set

DECLARATION OF RON FINK

I, Ron Fink, declare as follows:

1. I am over the age of 18. The facts set forth herein are of my own personal knowledge, and if called upon to testify as a witness, I could and would competently testify thereto.

2. I have been employed by Meiji America, Inc. ("Meiji America") for approximately eighteen years. For the past eleven years, I have been Meiji America's Chief Operating Officer ("COO"). As Meiji America's COO, I have personal knowledge of, among other things, the company's corporate structure and subsidiaries.

3. Established in Japan in or around 1916, Meiji Co., Ltd. ("Meiji Co.") is a manufacturer and global distributor of confectioneries, dairy products, nutritional supplements, and pharmaceuticals. In or around 1990, Meiji Co. acquired D.F. Stauffer Biscuit Co., Inc. ("Stauffer"). In or around 1999, Meiji Co. acquired Laguna Cookie Company, Inc. ("Laguna Cookie").

4. As the North American Division of Meiji Co., Meiji America manufactures a variety of confectioneries and snacks in the United States. Following its establishment, Meiji America became the parent company of wholly owned subsidiaries Stauffer and Laguna Cookie. Meiji America and Laguna Cookie share the same principal business address (360 S. Belmont St., York, Pennsylvania 17403), mailing address (P.O. Box 12002, York, Pennsylvania 17402), and California office of corporation address (4041 West Garry Ave., Santa Ana, California 92704) listed with the California Secretary of State.

5. Both Stauffer and Laguna Cookie operate together out of Meiji America's Santa Ana, California manufacturing facility. The Santa Ana, California facility—where Plaintiff worked—has signs on the side of the facility for Meiji Co., Stauffer, and Laguna Cookie. All employees at the Santa Ana, California facility are provided the same employee handbook which contains both Meiji America and Stauffer's logo on the cover, explains that Meiji America is the parent company of Stauffer and Laguna Cookie, and notes that its policies "appl[y] to all team members of Meiji America and its wholly owned subsidiaries (Laguna and Stauffer's)[.]"

6. Due to its corporate structure, Meiji America has been named alongside Stauffer and/or Laguna Cookie in California employment lawsuits. Most recently, Meiji America was a named defendant alongside Laguna Cookie in a class action matter titled *Eric Wright, v. Laguna Cookie Company, Inc.; Meiji America, Inc.; Partners Personnel – Management Services, LLC*, filed in Orange County Superior Court (Case No. 30-2024-01391885-CU-OE-CXC) on April 5, 2024. Similarly, Meiji America and Laguna Cookie were named defendants in a separate, but related, matter seeking civil penalties under the California Private Attorneys' General Act (the "PAGA") titled *Eric Wright, v. Laguna Cookie Company, Inc.; Meiji America, Inc.; Partners Personnel – Management Services, LLC*, filed in Orange County Superior Court (Case No. 30-2024-01405503-CU-OE-CXC) on June 10, 2024.

7. As Meiji America's COO, I also have personal knowledge of the company's employment practices liability insurance ("EPLI") with Travelers Casualty and Surety Company of America ("Travelers"). Meiji America's EPLI policy with Travelers covers Stauffer and Laguna Cookie, and covers a set amount of expenses, costs, or fees incurred by Meiji America, Stauffer, and/or Laguna Cookie in defense of any wage and hour claims asserted against the companies. As the claims asserted in the matter titled *Oxeni Juarez De La Cruz v. Laguna Cookie Company Inc.; D.F. Stauffer Biscuit Co., Inc.*, filed in Orange County Superior Court (Case No. 30-2024-01381818-CU-OE-CXC), concerned various purported violations of the California Labor Code, Meiji America's EPLI policy with Travelers covered a portion of the defense-related expenses incurred by Meiji America, Stauffer, and Laguna Cookie during the litigation of the matter.

8. This declaration is given voluntarily. I have not been pressured or promised anything in connection with this declaration. I have had the opportunity to review the contents of this declaration and make any changes I believe are necessary to ensure that it is accurate.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and this declaration was executed on June 5, 2026 at York, Pennsylvania.

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Ron Fink

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