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Attorneys for Plaintiffs Jesus Moran Martinez, Jr.,
 Aaron Mendoza, and Francisco Varela, Jr., individually
 and on behalf of others similarly situated

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

JESUS MORAN MARTINEZ JR., AARON
 MENDOZA, and FRANCISCO VARELA JR.,
 individually, and on behalf of all others similarly
 situated, and on behalf of the State of California
 and other aggrieved persons,

Plaintiffs,

v.

BREWERY X, LLC, a Delaware limited
 liability company; and DOES 1 through 10,
 inclusive,

Defendants.

Case No.: 30-2023-01370101-CU-OE-CXC

*Assigned for all purposes to:
 Hon. Melissa R. McCormick, Dept. CX105*

**DECLARATION OF FRANCISCO
 VARELA, JR. IN SUPPORT OF MOTION
 FOR PRELIMINARY APPROVAL OF
 CLASS ACTION AND PAGA
 SETTLEMENT**

PRELIMINARY APPROVAL HEARING

Date: November 13, 2025

Time: 2:00 p.m.

Dept.: CX105

Reservation Number: 74647220

I, Francisco Varela, Jr., hereby declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of my Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for Brewery X, LLC (“Brewery X”) as an hourly-paid, non-exempt delivery driver from around July 2022 to approximately October 2024. My job duties included, without limitation, delivering products from the Defendant’s Anaheim warehouse to Defendant’s locations, grocery store chains, and other clients or restaurants.

3. Based on my experience and knowledge of Defendant’s wage and hour policies and my familiarity with its employment practices, I worked with my attorneys to bring claims on my own behalf as well as on behalf of other hourly-paid, non-exempt employees of Defendant.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to other hourly-paid, non-exempt employees of Defendant. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other hourly-paid, non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid, non-exempt employees at Defendant.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid, non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by Defendant’s company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by Defendant.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

7. Further, when I decided to become involved in this lawsuit as a class representative on behalf of other employees of Defendant and as a private attorney general for the State of California, I understood that I was not only seeking unpaid wages and penalties on behalf of

1 myself, but also for other employees who worked for Defendant, and that by doing so, I would be
2 delaying more immediate recovery available to me through the Labor Commissioner's office.

3 8. I was also made aware that being a class representative and private attorney general
4 in an action filed on behalf of others would subject me to a stigma that is sometimes associated
5 with those who bring these kinds of lawsuits. I was aware that, as a class representative and private
6 attorney general, I might be responsible for some or all of Defendant's legal costs if the case was
7 not successfully concluded. Even with knowledge of these risks, I was willing to go forward and
8 to act on behalf of the other employees and the State of California, but I was nervous about losing
9 and having a judgment filed against me for costs or losing job opportunities in the future.

10 9. I understood that there were risks involved in class and representative action
11 lawsuits. I understood that the lawsuit could continue for several years and require my services and
12 attention throughout the entire length of the lawsuit. I learned that even if we won at trial, the case
13 could be further delayed by appeals.

14 **Notoriety and Personal Difficulties Encountered**

15 10. As the named plaintiff, I am the face of the litigation. As of the date of this
16 declaration, the class notice will be mailed in this case to 442 current and former employees of
17 Defendant, which will inform them that I filed a class and representative action against Defendant.
18 Exposing myself to this kind of publicity creates a risk for my future career prospects, since current
19 and former employees of Defendant may move to different companies within the industry or may
20 know people at other companies within the industry who may not wish to hire someone who sued
21 his employer. I also understand that having filed this lawsuit in court means that there is now a
22 permanent public record of this lawsuit available to the general public. Given this additional
23 exposure, there is further risk to my future career prospects.

24 **Amount of Time and Effort Spent and Duration of the Litigation**

25 11. I have always kept the best interests of the other hourly-paid, non-exempt employees
26 in mind while performing my duties as the named plaintiff in this case. I have been committed
27 throughout the course of this case to vigorously prosecuting this case on behalf of myself and the
28 other employees. I believe that I have demonstrated my ability to advocate for the interests of the

1 other hourly-paid, non-exempt employees by initiating this lawsuit, providing documents and
2 information to my attorneys, keeping in regular contact with my attorneys regarding the status of
3 the case, and reviewing the settlement agreement to make sure it was fair.

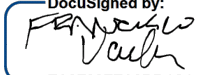
4 **Personal Benefit Received as a Result of the Litigation**

5 12. Absent the requested service payment, the personal benefit I will receive is the same
6 as all other employees. But unlike the other employees, who are only releasing the wage and hour
7 claims asserted in the lawsuit, I have signed a general release of claims as to Defendant.

8 13. I will continue to actively participate in this lawsuit as necessary, and will continue
9 to make myself available to assist in this case moving forward as needed.

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

12 Executed on August 28, 2025 at Lakewood, California.

13 DocuSigned by:
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15 Francisco Varela, Jr.
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