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Attorneys for Plaintiff YANETH GUZMAN, in a Representative Capacity only, and on behalf of other members of the general public similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF RIVERSIDE

YANETH GUZMAN, in a Representative
capacity only, and on behalf of other
members of the general public similarly
situated,

Plaintiff,

vs.

HADLEY DATE GARDENS, INC., a California
Corporation; HADLEY, INC., a California
Corporation; and DOES 1-10, inclusive,

Defendants

CASE NO. CVPS2404374

**DECLARATION OF YANETH GUZMAN
IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

Date: July 16, 2025

Time: 8:30 a.m.

Dept.: 1

Judge: Hon. Harold W. Hopp

I, Yaneth Guzman, hereby declare as follows:

1. I am the named Plaintiff in the above-captioned matter. I make this declaration in support of Plaintiff's Unopposed Motion for Approval of PAGA Settlement.
2. I am personally familiar with the facts set forth in this declaration, and if called to testify as a witness I could and would do so.
3. To my recollection, I personally met with my Attorneys on at least 4 occasions. Several of those meetings lasted in excess of 1 hours.
4. During these meetings, I would review and explain numerous documents turned over by Defendants from my employment. I would also explain my (as well as others') role during work. I also helped identify numerous other employees who could support the claims I was making in this lawsuit. I contacted many of these individuals myself to verify their willingness to participate.
5. I also spoke with my attorneys on the phone on at least 10 other occasions.
6. I also spent significant time reviewing the settlement documentation and discussing the settlement with my attorneys.
7. In total, I estimate that I spent at least 25 hours related to the above mentioned tasks directly working with my attorneys. I also spent at least another 6-8 hours of my own time gathering evidence and outlining issues that I later shared with my attorneys.
8. When I decided to move forward with this case, I was counseled by my attorneys of the potential stigma of being a Class Representative in a representative action, as this is a publicly filed lawsuit.
9. I was also advised when I brought this case that had we lost, I could have been personally liable for paying all of Defendants' costs. I was further advised this could be well into the tens of thousands of dollars on this type of case.

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1 10. Despite these risks I was committed to achieving a settlement that would benefit all employees
2 working for Hadley Date Gardens, Inc.

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4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and correct. Executed this 30th day of May, 2025 at San Diego, California.

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7 Firmado por:
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9 Yaneth Guzman
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