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Attorneys for Plaintiff Juan Jardon

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

JUAN JARDON, individually, and on behalf
of all others similarly situated,

Plaintiff,

vs.

GOLDEN SPECIALTY FOODS, LLC; and
DOES 1 through 10, inclusive,

Defendants

Case No.: 24STCV15717

[Assigned for all purposes to: Hon. William F.
Highberger, Dept. SSC-10]

**DECLARATION OF PLAINTIFF JUAN
JARDON IN SUPPORT OF APPROVAL OF
CLASS AND REPRESENTATIVE ACTION
SETTLEMENT**

[Filed with (1) Plaintiff's Notice of Motion and
Motion for Preliminary Approval of Settlement, (2)
the Declaration of Kane Moon, (3) the Declaration
of Sean Hartranft, and (4) [Proposed] Preliminary
Approval Order]

PRELIMINARY APPROVAL HEARING:

Date: December 15, 2025

Time: 3:30 p.m.

Dept.: 10

Action filed: June 24, 2024

Trial date: Not set

DECLARATION OF JUAN JARDON

I, Juan Jardon, declare as follows:

1. I am the named Plaintiff in this case. I am a former employee of the named Defendant, Golden Specialty Foods, LLC (“Defendant”). As such, I have personal knowledge, or am informed and believe, of the following facts. If called as a witness, I could and would testify competently to the following.

BACKGROUND OF EMPLOYMENT

2. I worked for Defendant as a cook in California from approximately January 2010 to April 2024. During my employment, I was typically scheduled to work five days each workweek and 8 or more hours each workday. I was paid on an hourly basis and classified as non-exempt throughout my employment.

3. During my employment with Defendant, I believe that its wage-and-hour practices placed employees, including me, at a disadvantage. For instance, I believe I was not paid for all the hours I worked, including off-the-clock time required to wait in line to use the timeclock machine. Also, due to the nature of my work, I regularly experienced problems with receiving all timely, full, and uninterrupted meal breaks, and I do not recall ever waiving my meal periods.

4. As a result of Defendant's wage-and-hour practices, I believe I have suffered unpaid wages.

COMMONALITY AND PREDOMINANCE

5. I believe Defendant's wage-and-hour practices that affected me also affected all of Defendant's non-exempt employees. For instance, I believe the practice of not paying for all hours worked was common among all Defendant's employees. I also believe other employees experienced problems with receiving timely, full, and uninterrupted breaks.

6. As a result of Defendant's wage-and-hour practices, I believe other employees were harmed and are therefore owed wages.

TYPICALITY AND ADEQUACY

7. I was employed by Defendant in California in an hourly paid, non-exempt position during the Class Period and was subject to the same pay structure and rules as all other non-exempt employees of Defendant. Accordingly, I brought this class action case on behalf of all other employees who are also or were at some point classified as non-exempt during their employment with Defendant. I believe my claims in this case impacted not only me but the entire Class.

1 8. I am not aware of anything special about me that would raise unique defenses to my claims
2 as opposed to the claims of the Class as a whole. I am not suing for anything unique to me. Rather, my claims
3 are based upon the same facts that relate to the rest of the Class.

4 9. I do not believe I have any conflicts of interest with other Class Members. I have agreed to
5 place Class interests above my own. I do not intend to take any action that would place me in a position that
6 is hostile to other Class Members.

7 10. I also do not believe I have any conflicts of interest with Apex Class Action Administration,
8 the neutral entity selected to administer this Settlement.

9 CLASS REPRESENTATIVE DUTIES

10 11. This lawsuit is not an individual lawsuit. Rather, it is a proposed class action. I understand
11 that as the Class Representative in this matter, I have an obligation to do my best to look out for the interests
12 of other Class Members. I understand my obligations to the Class exist even when the Class is certified solely
13 as part of a settlement. It is my understanding that, as one part of this duty to the Class, I cannot agree to a
14 settlement to benefit myself to the exclusion of the rest of other Class Members. I have never asked my
15 attorneys to simply settle this matter at any cost. Rather, I asked them to obtain the best settlement they could,
16 within reason, and I believe that they have done so.

17 12. I understand the obligations of being an adequate Class Representative include significant
18 responsibilities and a fiduciary duty to represent the Class, which means responding truthfully, completely,
19 and promptly to any information requests made by my attorneys; reviewing facts and claims in the case to
20 make certain the alleged Labor Code violations are redressed; participating dutifully in the litigation; making
21 myself available for any meetings, proceedings, and court hearings at which I am needed; and, above all,
22 putting Class interests above my own.

23 13. I brought this class action in full recognition and acceptance of my responsibilities as the
24 Class Representative, and I continue to appreciate the importance of my responsibilities as the litigation
25 continues.

26 14. This case was filed over a year ago and since then, I have never asked to be relieved from
27 my role as the Class Representative. To the contrary, I have made myself available whenever my attorneys
28 wanted to discuss aspects of my employment by Defendant, and I remain committed to seeing this matter

1 through to the end.

2 15. My goal in bringing this lawsuit was to obtain a recovery on behalf of the Class and, even
3 more importantly, to put an end to what I believe are illegal employment practices on the part of Defendant.

4 16. I believe that were it not for my stepping forward and taking on the duties of protecting the
5 interests of other Class Members in this case, it is likely that the interests of the Class would neither have been
6 prosecuted nor benefited.

7 17. I have been, and will continue to be, actively involved in assisting my attorneys to support
8 this wage-and-hour action, including after any order finally approving the Settlement.

9 18. Summing it all up in the simplest terms, I asked to be the stand-in for other employees of
10 Defendant as the Class Representative. Because of that, I cannot quit on the Class, and I cannot put myself
11 and my interests before the Class. I accept these duties and request that the Court appoint me as the Class
12 Representative, for settlement purposes only.

13 REASONABLENESS OF ENHANCEMENT AWARD

14 19. I conferred in depth with my attorneys about the Class and Representative Action Settlement
15 Agreement (the "Settlement") prior to signing it. I am not an accountant, but I generally understand the factors
16 and risks that should be considered when evaluating a settlement. I believe the proposed Settlement is fair,
17 adequate, and reasonable, and therefore, I would recommend the Court approve it.

18 20. In conformance with the Settlement, I am requesting a Class Representative Enhancement
19 Award to me in the amount of \$7,500.00, which is I understand is subject to the Court's approval and potential
20 reduction. I understand that any enhancement awarded to me will be in addition to the Individual Class and
21 PAGA Payments I am eligible to receive as a Participating Class Member and PAGA Member. I believe the
22 requested enhancement award is fair compensation to me for initiating and helping to prosecute this case, for
23 my effort and time on this case, and for the substantial risks I undertook with respect to agreeing to be the
24 named Plaintiff in this case.

25 21. My participation began with bringing certain issues that are involved in this matter to my
26 attorneys' attention and explaining the factual background that was used to prosecute the claims in this case.
27 For example, I provided to my attorneys and reviewed with them documents from my employment by
28 Defendant that I had in my possession, and I explained those documents and related facts to my attorneys to

1 assist them in their review and analysis. I also assisted in identifying potential witnesses, including other
2 employees, who might likewise have been of assistance. My efforts continued after the suit was filed. For
3 example, I continued to review with my attorneys information about my employment and documents
4 produced by Defendant through discovery.

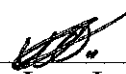
5 22. I have assumed some long-lasting risk in prosecuting this case. For example, because it
6 is so easy to search for information online these days, I face an increased risk that prospective future
7 employers may discover information about this lawsuit and have a negative reaction to learning that I
8 sued a former employer. A search of my name would reveal this employment class action, and as a result,
9 prospective employers may forego hiring me. This would make it difficult to obtain future employment
10 or change jobs for a better opportunity.

11 23. I have devoted my own time to this litigation to ensure a fair result for the Class. This
12 involved ongoing communications with my attorneys throughout the course of this case, gathering
13 documents and information useful for the litigation, assisting my attorneys in preparation for and during
14 settlement negotiations, reviewing the Settlement in depth prior to signing, and preparing the instant
15 declaration for settlement approval. In total, I believe I have spent roughly 60 hours to-date assisting my
16 attorneys with this case and I anticipate spending future hours, including monitoring the status of settlement
17 approval, monitoring the status of funding and disbursement following any entry of judgment, and
18 communicating with any Class Members to answer any questions they might have.

19 24. I am glad to have had the opportunity to represent the Class in this lawsuit.
20

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

23 Executed on August 21, 2025, at Los Angeles, California.
24

25 

26 Juan Jardon
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