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Attorneys for Plaintiff ISMAEL MERCADO,
ALEX ORTIZ and SAVANNAH RHUE

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

ISMAEL MERCADO, ALEX ORTIZ and
SAVANNAH RHUE, individually and on
behalf of others similarly situated,

Plaintiffs,

vs.

NATURAL ALTERNATIVES
INTERNATIONAL, INC.; and DOES 1
through 25, inclusive,

Defendants.

Case No.: 37-2023-00052115-CU-OE-CTL
(Consolidated with Case No. 24CU008031C)

*Honorable Blaine K. Bowman
Department C-74*

**DECLARATION OF PLAINTIFF
ALEX ORTIZ IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: February 20, 2026
Time: 8:30 a.m.
Dept: SD-74

Complaint Filed: December 1, 2023
Trial Date: Not Set

1 **DECLARATION OF ALEX ORTIZ**

2 I, Alex Ortiz, declare and state as follows:

3 1. I am over the age of eighteen (18) and a resident of the State of California. I am one
4 of the named plaintiffs in the above-captioned case. I have personal knowledge of the facts and
5 statements set forth in this declaration, and if called upon to testify, I could and would competently
6 testify thereto.

7 2. I was employed by Defendant Natural Alternatives International, Inc. as an hourly-
8 paid, non-exempt forklift operator from approximately November 2020 to approximately August
9 2023.

10 3. Because I believed Defendant's practices were unlawful, I sought legal advice about
11 my work experiences and decided to pursue a lawsuit. I contacted Blackstone Law, APC and spoke
12 with their attorneys. I wanted to hold Defendant accountable for failing to properly compensate
13 employees for all hours worked and for meal and rest break violations. After my initial consultation,
14 I researched class action and PAGA lawsuits independently. I then consulted further with Blackstone
15 Law, APC's attorneys about class actions and representative actions under the Private Attorneys
16 General Act to fully understand what pursuing such a lawsuit entailed before moving forward.

17 4. I have regularly conferred with my attorneys throughout this case as part of my
18 responsibilities as a class and PAGA representative. I searched for and provided documents
19 concerning my employment with Defendant, answered my attorneys' questions about those
20 documents, and provided information about the company's practices and the duties of other hourly-
21 paid and non-exempt employees. I also assisted in developing discovery strategy regarding what
22 additional documents and information to seek from Defendant.

23 5. I routinely communicated with my attorneys to ensure they had my current contact
24 information and any additional information I obtained. I made myself available to answer questions
25 about Defendant's practices and treatment of employees, responded promptly, and provided thorough
26 information.

27 6. I understood that in the event this matter did not settle and proceeded with trial, I would
28 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any

1 responsibilities that are necessary for this lawsuit.

2 7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
3 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
4 also understood there was a risk of losing any job and/or income due to the time that I would have to
5 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. In
6 contrast, the other employees who will be receiving money from this lawsuit did not have to file a
7 claim or take the risk that I took in bringing this action.

8 8. I reviewed the settlement agreement, discussed the settlement agreement with my
9 attorneys, and asked them questions before signing it.

10 9. I have fulfilled all responsibilities my attorneys requested of me and worked diligently
11 to seek relief for the Class Members, the PAGA Employees, and the State of California. I have spent
12 approximately 45-50 hours participating in this case as described above. My efforts as a class and
13 PAGA representative contributed to achieving this settlement.

14 10. I understand that any resolution of this lawsuit on a class wide basis is subject to court
15 approval, and any settlement must be designed in the best interest of the Class as a whole. At all times
16 throughout the course of this litigation, I have considered the interests of the Class and put them before
17 my own personal interests.

18 11. I understand that enhancement payments are discretionary and intended to compensate
19 named plaintiffs for the quality and quantity of work performed on behalf of the class and other
20 employees, the financial and reputational risks undertaken in bringing the action, and the benefits
21 resulting from the representative's efforts. Based on my contributions described above, I believe an
22 enhancement payment is warranted in this case.

23 12. I respectfully request the Court approve an enhancement payment of \$10,000 in
24 recognition of my efforts and active participation in this case and the broader general release of all
25 claims I have against Defendant. Given the time I dedicated to this case, I believe this amount is
26 reasonable.

27 13. I am not related to anyone associated with Blackstone Law, APC.
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1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct. Executed on 01/20/2026, at Escondido, California.

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