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Attorneys for Plaintiffs 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  
ISMAEL MERCADO 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

## **DECLARATION OF ISMAEL MERCADO**

I, Ismael Mercado, declare and state as follows:

1. I am over the age of 18 and a California resident. I am a plaintiff named in this action. I have personal knowledge of the facts stated in this declaration and am competent to testify to them.

2. I was employed by Defendant Natural Alternatives International, Inc. as an hourly-paid, non-exempt operator from approximately October 2018 to approximately August 2020.

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

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

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

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

7. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I

1 also understood there was a risk of losing any job and/or income due to the time that I would have to  
2 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. In  
3 contrast, the other employees who will be receiving money from this lawsuit did not have to file a  
4 claim or take the risk that I took in bringing this action.

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

7 9. I have fulfilled all responsibilities my attorneys requested of me and worked diligently  
8 to seek relief for the Class Members. I have spent approximately 45-50 hours participating in this case  
9 as described above. My efforts as a class representative contributed to achieving this settlement.

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

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

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

23 13. I am not related to anyone associated with Blackstone Law, APC.  
24

25 I declare under penalty of perjury under the laws of the State of California that the foregoing  
26 is true and correct. Executed on 01/20/2026, at Vista, California.  
27  
28

*Ismael Mercado*

Ismael Mercado