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Attorneys for Plaintiffs CONSUELO VAZQUEZ and MARIA CEBALLOS, as individuals, and on behalf of all similarly situated employees,

[Additional Counsel for Plaintiffs are on the following Page],

SUPERIOR COURT OF THE STATE OF CALIFORNIA

THE COUNTY OF MERCED

CONSUELO VAZQUEZ, as an individual and
on behalf of all similarly situated employees,

Plaintiff,

v.

CALIFORNIA FRESH FARMS LLC; and DOES
1 through 50, inclusive,

Defendants.

Case No.: 24CV-03339

Consolidated Case Nos.: 24CV-04490 and 25CV-00518

CLASS ACTION

**DECLARATION OF CONSUELO VAZQUEZ
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Assigned for all purposes to:
Hon. Mark V. Bacciarini, Dept.: CR 8

Complaint filed: June 28, 2024

Trial Date: No Trial Date Set

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I, CONSUELO VAZQUEZ, hereby declare as follows:

1. I am an individual residing in California. I am over the age of eighteen and a Plaintiff in the consolidated case of *Vazquez, et al. v. California Fresh Farms LLC*, (“Action”) Merced County Superior Court Case No. 24CV-03339, pending in the Superior Court of the State of California, County of Merced. The information contained herein is based on my personal knowledge and if called as a witness I could and would testify competently hereto.

2. I worked for Defendant CALIFORNIA FRESH FARMS LLC (“Defendant”) as a non-exempt employee from in or around 2017 through on or around December 2023.

3. I believe that certain employment practices of Defendant were unlawful, including but not limited to: (1) failure to pay all wages; (2) failure to provide meal periods or compensation in lieu thereof; (3) failure to provide rest periods or compensation in lieu thereof; (4) failure to pay wages upon ending employment; (5) violation of the Unfair Competition Law pursuant to Business & Professions Code sections 17200, *et seq.*; (6) failure to reimburse for all necessary business expenditures; and (7) violation of the Private Attorney General Act (“PAGA”).

4. I decided to file a class action lawsuit based on these allegations and violations and agreed to serve as a Named Class Representative in order to represent other employees that I knew were similarly affected by Defendant's conduct. I understood that by acting as the Class Representative I had a duty to protect the interests of the class even to the detriment of my own individual claims and interests.

5. I believed I could adequately represent the proposed class of employees and would prevail in my case. I believe I am an adequate class representative because my interests are the same as all current and former non-exempt employees employed by Defendant in California during the Class Period.

6. I willingly and knowingly brought the claims on behalf of the Class Members. I fully understand that as class representative, I hold certain fiduciary duties to the Class Members and must always consider their interests. Throughout this lawsuit I sought the same damages and remedies, specifically for unpaid wages, meal and rest period penalties, and other available remedies. I believe that I have diligently served as class representative in this matter.

1 7. I understood it was my responsibility to actively participate in the lawsuit to safeguard the
2 interests of other Class members, and to ensure that my interests were not in conflict with those of the
3 other employees. I did so to the best of my ability, and I believe I have maintained the best interests of
4 the Class Members. I have actively participated in this litigation and have been updated of the progress
5 of the case. I have provided documents to Class Counsel in support of the class claims and spent many
6 hours discussing my claims and information regarding my employment by Defendant. I have also
7 invested significant time and efforts in performing my duties on behalf of the Class, including during the
8 initial complaint drafting process, review of informal discovery before mediation, and answering
9 Plaintiffs' counsel's questions, in connection with the mediation and ongoing settlement negotiations,
10 and now throughout the preliminary and final settlement approval process.

11 8. By agreeing to be a Named Class Representative in this case, I took a significant
12 professional risk. Subsequent employers could easily learn I had sued my former employer, which could
13 jeopardize my prospective employment. I was willing to take on this risk in order to pursue recovery on
14 behalf of other employees. There is also a real possibility that due to my involvement in this case, future
15 employers may be less inclined to hire me or could even refuse to hire me.

16 9. I have spent a lot of time speaking with and exchanging e-mails with my counsel to receive
17 answers to my questions or updates on the case progression. I estimate I have devoted approximately at
18 least **40 hours** of my time to this action representing the interests of the Settlement Class, including by
19 performing the following:

20 a. Researching the issues and claims I could bring against Defendant and talking to
21 my attorneys about initiating this action;

22 b. Being interviewed in detail by my counsel regarding the working conditions we
23 operated under for Defendant, and particularly my experiences and the policies and practices that
24 applied to my employment and the employment of the other similarly situated employees;

25 c. Searching for and gathering relevant documents in my possession and providing
26 them to my attorneys, and reviewing documents provided by Defendant;

1 d. Speaking with and informing my attorneys and addressing how my experiences
2 were similar to my co-workers and responding to questions from Plaintiffs' counsel in preparation for
3 mediation;

4 e. Preparing for mediation and reviewing settlement related documents and working
5 with counsel to prepare and provide executed final versions of the Settlement Agreement. I have also
6 worked with counsel in connection with the motion for preliminary approval of the Settlement
7 Agreement and will also do so as necessary in connection with final approval; and

8 f. Regularly receiving and responding to correspondence and phone calls from my
9 attorneys and sending many e-mails regarding the claims and case status and then the Settlement and
10 other related documents.

11 10. My opinion about the fairness and adequacy of the settlement in the case is not based on
12 any potential payment. I also believe this amount is fair and justified because it is in consideration for a
13 full general release, one that is much broader than the limited claims release for all Class Members. I was
14 willing to agree to my broader release because it helped the parties agree to the Settlement, which I
15 believe is an excellent result for the Class Members I have committed to represent.

16 11. I have not yet received any consideration or promises that are different than any of the
17 other Class Members. In my opinion, the requested Enhancement Payment of ten thousand dollars
18 (\$10,000.00) is fair and reasonable given the risks I have taken, the tasks I have performed, the time I
19 have invested, and the real benefit which the Class Members will receive from this class action. I
20 understand my requested ten thousand dollars (\$10,000.00) service award is subject to the Court's final
21 approval and discretion, and I respectfully request that the Court approve awarding it and approve me to
22 serve as a Class Representative for Settlement purposes.

23 12. I do not have any actual or potential conflicts of interest with any putative class members
24 or the Settlement Administrator.

25 13. While I did not type this declaration, I did review it completely and was given the
26 opportunity to ask questions and make changes. This is an accurate summary of the information I
27 provided to my attorneys.
28

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

3 Executed on 10 / 03 / 2025 at Merced, California.

4 *Consuelo Vazquez*

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6 CONSUELO VAZQUEZ
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PROOF OF SERVICE

Code of Civ. Proc. § 1013a, subd. (3)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 249 East Ocean Boulevard, Suite 814, Long Beach, California, 90802.

On **November 3, 2025**, I served [X] true copies [] originals of the following document(s):
DECLARATION OF CONSUELO VAZQUEZIN SUPPORT OF PLAINTIFFS' MOTIONFOR PRELIMINARY APPROVAL OF CLASSACTION SETTLEMENT. I served the document(s) on the person(s) below as follows:

Jones Day Elizabeth McRee, Esq. Cindy Ritchey, Esq. Koree B. Wooley Esq. 4655 Executive Drive, Suite 1500 San Diego, CA 92121	Attorneys for Defendant California Fresh Farms, LLC Telephone: (858) 314-1200 Email: kbwooley@jonesday.com critchey@jonesday.com emcree@jonesday.com
MATERN LAW GROUP, PC Matthew J. Matern, Esq. Launa Adolph, Esq. Keyvon Sabourian, Esq. 2101 E El Segundo Blvd., 403 El Segundo, CA 90245	Attorneys for Plaintiff Consuelo Vazquez and Maria Ceballos Telephone No.:310-531-1900 Facsimile No.: 310-531-1901 Email: KSabourian@maternlawgroup.com emcree@jonesday.com LAdolph@maternlawgroup.com

The document(s) were served by the following means:

☒ **By e-mail:** Based upon court order or an agreement of the parties to accept service by e-mail, I caused the document(s) to be sent to the persons at the electronic service addresses listed above from the email address tnghuyen@mahoney-law.net. Within a reasonable time after the transmission, no error, electronic message, or any other indication that the transmission was unsuccessful was received.

☒ **(State):** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **November 3, 2025**, at Long Beach, California.



Tuan Nguyen