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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KERN

GERMAN ATONDO, individually, on behalf of
all others similarly situated, the State of
California, and other aggrieved persons,

Plaintiff,

v.

LAUREL AG & WATER, LLC, a California
limited liability company; LODI PUMP &
IRRIGATION, LLC, a California limited
liability company; LODI PUMP AND
IRRIGATION, LLC, a California limited
liability company; U.S. PIPE AND
IRRIGATION, LLC, a California limited
liability company; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: BCV-24-102996
Assigned to Honorable T. Mark Smith, Dept. 2
Complaint Filed: August 30, 2024
Trial date: Not set

PAGA REPRESENTATIVE ACTION

**DECLARATION OF GERMAN ATONDO
IN SUPPORT OF PLAINTIFF’S MOTION
TO APPROVE PAGA SETTLEMENT**

DECLARATION OF GERMAN ATONDO

I, German Atondo, declare as follows:

1. I am an adult resident of the State of California, and, if called as a witness in this action, I would testify truthfully to the matters described in this declaration. All of the matters described in this declaration are within my personal knowledge, except those matters that are stated to be upon information and belief. As to such matters, I believe them to be true.

2. I make this declaration entirely of my own free will and choice. I have not been promised any benefit for doing so, and I have not been pressured into giving this declaration. Before signing this declaration, I was given the opportunity to review it, make changes, and verify the accuracy of its contents.

3. I am the named Plaintiff in this action filed pursuant to the Private Attorneys General Act ("PAGA") and submit this declaration in support of Plaintiff's Motion to Approve PAGA Settlement. Because I believe I have provided invaluable assistance during the course of this case, I am hopeful that the Court will approve my request of a \$10,000.00 service payment for my role as the PAGA Representative.

4. I am a former employee of Defendant Laurel Ag & Water, LLC and U.S. Pipe and Irrigation, LLC ("Defendant"). I worked for Defendant from approximately October 2023 to approximately February 2024 as an hourly-paid or non-exempt employee. Throughout the entirety of my employment, I was subject to Defendant's policies and practices that have been alleged as unlawful in the complaint.

5. I filed this lawsuit because I was concerned that I was not paid properly for all the hours that I worked, I was not provided all of my meal and rest breaks, and I was not reimbursed for all business expenses. While working for Defendant, my coworkers and I were asked to work long hours because of the amount of work, sometimes without taking meal and rest breaks and without receiving compensation for all hours worked. I also observed my co-workers working long hours without taking breaks.

6. By representing other aggrieved employees in this lawsuit, I hoped that I might be able to change Defendant's policies to better protect the working conditions of my co-workers. I

1 also understood it was my duty as the PAGA Representative to represent the State of California
2 and other aggrieved employees, know about the lawsuit, help my attorneys, and keep updated on
3 the case.

4 7. Prior to commencing this case, I provided Wilshire Law Firm, PLC with a detailed
5 account of the facts related to my employment with Defendant. Additionally, I provided my
6 counsel with documentation in the form of pay statements that applied to my employment with
7 Defendant. Based on my conversations, my attorneys and I were able to identify instances when I
8 was not paid correctly.

9 8. I have invested a lot of personal time and energy while this lawsuit has been
10 pending. I made it a priority to be actively involved because I wanted to do everything I can to
11 assist my attorneys in prosecuting this case. I regularly communicated with my attorneys and their
12 staff to discuss updates on the case and to provide my attorneys with additional information.

13 9. I spent multiple hours looking for documents that my attorneys asked me to provide
14 to help this case.

15 10. I also made myself available during the mediation for this case and I kept in regular
16 contact my attorneys before and after the mediation to ensure that any questions the attorneys had
17 could be answered.

18 11. I also reviewed documents filed in this case, including the settlement-related
19 documents.

20 12. I believe the settlement is a good settlement and I would recommend that the Court
21 approve it because I believe that this settlement is fair, adequate, and reasonable in view of PAGA's
22 purposes. I am glad that I had the opportunity to represent the State of California and the aggrieved
23 employees in this lawsuit and that I was able to recover penalties through a settlement for the
24 aggrieved employees. I have also observed my attorneys' work throughout this case and I believe
25 they have been thorough, diligent, prompt, courteous, and professional.

26 13. I estimate that I spent **at least 80 hours on this case** since I first contacted Wilshire
27 Law Firm, PLC.

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14. I did not make the decision to file this representative action lightly. I was concerned by the attention a lawsuit, and especially a representative action, would attract. My name would be associated with a lawsuit that I filed against my former employer and I am mindful that future employers might find out that I sued a former employer, which could hurt my employability. In a competitive job market, this factor may weigh heavily against me.

15. Standing up for myself and the rights of others was not an easy decision, and I am relieved that this case is coming to an end.

16. I respectfully request that the Court award me a \$10,000.00 service payment. I am receiving no additional compensation other than the compensation provided for in the settlement. Based on my involvement in this case and the benefits provided to workers of Defendant, I can say I helped represent the other workers who may have been too afraid to say anything to management because they did not want to risk losing their jobs or risk the stigma of suing an employer. I was not afraid to take that risk because I strongly care about helping my fellow co-workers.

17. I reviewed and signed the PAGA Settlement Agreement in full and my attorneys answered all the questions I had. I believe the settlement terms and allocations are fair, adequate, and reasonable given the strength of the class claims and Defendant's defenses.

18. I have no conflict of interest with any class member or the Settlement Administrator, Apex Class Action Administration.

I declare under penalty of perjury, under the laws of the State of California and the United States of America, that the foregoing is true and correct.

Executed on 4/3/2026 at El Centro, California.

DocuSigned by:

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German Atondo