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Attorney for Plaintiff,
Angel Gonzalez, on behalf of himself and all others similarly situated

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

PHILLIP POWELL and ANGEL
GONZALEZ, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

R & S BEVERAGE COMPANY LP, a
California limited partnership; and DOES 1
through 50, inclusive,

Defendants.

Case No. 24UC70842

Assigned for All Purposes to:
Hon. Stephen Place; Dept. 1

**DECLARATION OF ANGEL
GONZALEZ IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT AGREEMENT,
APPROVAL OF NOTICE TO CLASS
MEMBERS, APPROVAL OF
SETTLEMENT ADMINISTRATOR, AND
SETTING HEARING FOR FINAL
APPROVAL OF SETTLEMENT**

Hearing Date: June 12, 2026
Time: 1:00 p.m.

Complaint Filed: June 7, 2024

1 I, Angel Gonzalez, declare as follows:

2 1. I am a named representative in this case. I submit this declaration in support of Plaintiffs'
3 Motion for Preliminary Approval of Class Action and PAGA Settlement. I make this statement of my
4 own personal knowledge, and if called to testify, I could and would testify competently to the facts
5 below.

6 2. I was employed by R & S BEVERAGE COMPANY LP ("Defendant"), as an hourly paid
7 non-exempt employee.

8 3. During my time working for Defendant, I was not paid all wages, including all minimum
9 and overtime wages owed to me, I was denied uninterrupted meal and rest breaks, and I was not
10 reimbursed for having to use my personal cell phone for the benefit of Defendant.

11 4. During the time that I was employed at Defendant, I followed the same timekeeping,
12 scheduling and payroll policies and practices as the other hourly employees I observed and interacted
13 with.

14 5. At the beginning of this case, my attorneys made me aware of the general obligations of
15 serving a class representative Plaintiff in this case. Because of the wage and hour violations that I
16 experienced during my employment with Defendant, I agreed to serve as a class representative Plaintiff
17 and pursue my case as a class and representative action on behalf of the State of California and similarly
18 situated employees of Defendant.

19 6. By deciding to serve as a Named Plaintiff in this case, I agreed to pursue not only my
20 own wage and hour claims, but the claims of all similarly situated employees of Defendant, and, if
21 necessary, to put the interest of all similarly situated employees ahead of my own. I have no interests
22 that are antagonistic to my coworkers with respect to the claims alleged in this case. I pledged to actively
23 participate in the lawsuit and to assume the risks of serving as a Named Plaintiff in a class action. My
24 attorney also explained the risks associated with litigation, and that the case could take years to resolve,
25 and therefore required a long-term commitment on my part. I also understood that I was potentially
26 responsible for paying Defendant's attorney's fees and costs. However, I accepted these risks.
27
28

1 7. During this litigation, I have spent a significant amount of time working with my
2 attorneys and participating in this lawsuit as follows:

3 a. I regularly conferenced with my attorneys, before and after the filing of the
4 lawsuit, to discuss the status of the case, to offer my input on Defendant's practices and policies,
5 to provide names of witnesses, to assist in gathering evidence and documents that supported the
6 class claims, to review policy documents and payroll records from Defendant, and to discuss
7 settlement options; and

8 b. I also spent significant time helping my attorneys prepare for mediation and
9 answering questions about how Defendant's policies and practices impacted me and my
10 coworkers. I made myself available during the entirety of the all-day mediation which took place
11 on zoom, approved the tentative settlement, and reviewed and approved the final settlement
12 agreement. I regularly spoke with my attorneys to make sure I was fully informed of the facts
13 and settlement negotiations.

14 8. Overall, I estimate that I have devoted 35-45 hours of my time to this case. This was not
15 an easy thing to do as I have my own job and responsibilities.

16 9. By agreeing to bring this class and representative action, I accepted the responsibilities
17 of representing the interests of the State of California as well as all similarly situated employees and
18 willingly chose to assume risks and potential costs associated with the case. I did, and still do, have a
19 fear that future employers may not hire me should they find out that I served as a class representative
20 Plaintiff in a wage and hour lawsuit. However, this is another risk I am willing to take in order to further
21 the interests of the case.

22 10. I am aware that Defendant denies the allegations in this lawsuit and that there has been
23 no determination that Defendant is actually liable for any of these alleged violations. I also understand
24 that there are many risks and uncertainties involved in continuing to pursue this case. I have been
25 advised of the terms of the proposed settlement of this case, and in light of the risks and uncertainties in
26 proceeding with the case, I believe the proposed settlement is fair and reasonable and in the best interests
27 of the class members.
28

1 11. I have requested a service award for my services as Named Plaintiff in the amount of
2 \$2,500.00. I believe that my request for this service award is fair and reasonable in light of the amount
3 of work I put into this case to ensure a good result as well as the risks (as mentioned above) I took in
4 serving as a Named Plaintiff.

5 I declare under penalty of perjury that the foregoing is true and correct under the laws of the
6 State of California. Executed on 03 / 30 / 2026 in the City of Victorville, State
7 of California.

8
9 

10 _____
Angel Gonzalez