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Attorneys for Plaintiff JOE MORENO

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

JOE MORENO, on behalf of himself, other
Aggrieved Employes, and the State of
California,

Plaintiffs,

vs.

EAGLE FOODS, LLC, a California limited
liability company; RAMBO, LLC, a California
limited liability company; and DOES 1 through
50, Inclusive;

Defendants.

Case No.: 37-2021-00038129-CU-OE-CTL

**DECLARATION OF PLAINTIFF JOE
MORENO IN SUPPORT OF
PLAINTIFF'S MOTION TO APPROVE
PAGA SETTLEMENT**

Date: September 19, 2025

Time: 10:30 a.m.

Judge: Hon. Carolyn M. Caietti

Dept: 70

1 I, JOE MORENO, declare as follows:

2 1. I am a party to this action and reside in the State of California. I am fully competent
3 to make this declaration. I have personal knowledge of the facts set forth herein, except for those
4 stated on information and belief, and as to those I am informed and believe them to be true. If called
5 upon to testify, I could and would testify as set forth herein.

6 2. I make this Declaration in support of Plaintiff's Motion to Approve PAGA
7 Settlement.

8 3. I was employed by Defendants Eagle Foods, LLC and Rambo, LLC ("Defendants")
9 in California from approximately February of 2021 through March of 2021.

10 4. During my employment with Defendants, I was provided with wage statements that
11 failed to provide the accurate legal name and address of my employer. Since I suffered from wage
12 statement violations, I am informed and believe that I have standing to pursue the other California
13 labor code claims alleged on behalf of myself and the aggrieved employees in this action.

14 5. Before and during the course of litigation, I was actively involved in assisting my
15 attorneys to support the wage and hour claims asserted. My involvement began before the initial
16 complaint was filed wherein, I provided first-hand knowledge and documentation as to Defendants'
17 practices, ownership and corporate structure, and their wage and hour policies and practices.

18 6. I provided my attorneys with all the documentation provided to me by Defendants
19 during my employment.

20 7. I assisted in reviewing payroll records with my attorneys and informed them of
21 Defendants' employment policies and whether those policies matched Defendants' practices.

22 8. My attorneys called me to ask me questions over several times throughout the
23 litigation and I contacted my attorneys several times to stay updated on the case and offer my
24 assistance on any matters I could be helpful with. I was also available for mediation by telephone,
25 during which I was available to be called to answer the questions posed by the mediator regarding
26 the asserted claims, as well as arguments raised by Defendants. In addition, I worked with my
27 attorneys over the next several months after mediation to understand and execute a long form
28 settlement agreement.

1 9. Over the past few months since the mediation has been resolved, I have stayed in
2 touch with my attorneys to ensure that there was no undue delay in payment for other aggrieved
3 employees for whom I brought this Action.

4 10. I believe that, through the present, I have spent over 15 hours in connection with this
5 matter, which included time spent having preliminary calls with my attorneys; doing an intake with
6 my attorneys; time spent searching for documents relating to my employment; time spent reading
7 and understanding the Settlement Agreement; time spent discussing with my attorneys on
8 Defendants' policies and practices; time spent on-call at mediation; and time spent checking in on
9 the status of the case, among other things. I also spent time preparing this declaration to support
10 Plaintiff's Motion to Approve PAGA Settlement.

11 16. I feel that by bringing this lawsuit, I could stand up for not only my rights but the
12 rights of other employees who suffered from the same unfair wage practices. I felt that current
13 employees might not want to share their experiences with Defendants since they feared losing their
14 jobs. This is certainly understandable as I, too, have to provide for myself.

15 17. By bringing this lawsuit, I have put the interests of the aggrieved employees ahead
16 of my own.

17 18. I understood that I could possibly earn a small enhancement if this case is resolved
18 favorably. I also knew that I could face retaliation from Defendants and backlash from former
19 coworkers who are loyal to Defendants.

20 19. I have also had to provide a general release of claims to Defendants as part of the
21 settlement. My understanding, in addition, is that if I brought this case individually, I may have
22 earned more compensation individually and on a much quicker timeline than the timeline to resolve
23 this Action.

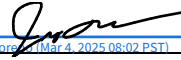
24 20. My goal in bringing this lawsuit was to obtain a recovery on behalf of the aggrieved
25 employees and, even more importantly, to put an end to what I believe are illegal practices on the
26 part of Defendants. I believe I have achieved both through this lawsuit and settlement.

27 21. I understand the obligations of adequately representing the employees of the
28

1 Defendants.

2 22. I understand the substantial burden I will have to undertake in order to represent the
3 employees of the Defendants.

4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and correct this 4 day of March 2025, at San Diego, California.
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Joe Moreno (Mar 4, 2025 08:02 PST)

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