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Attorneys for Plaintiffs, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

CINDY CARRANZA and JAYSON
PORRAS LOPEZ, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiffs,

vs.

DREAMFIELDS BRANDS INC., a
California Corporation; and DOES 1 through
20, inclusive;

Defendants.

Case No.: CIVSB2216530
*[Assigned to Hon. Joseph Ortiz, Dept S17, for
all purposes]*

**DECLARATION OF PLAINTIFF
JAYSON PORRAS LOPEZ**

1 I, Jayson Porras Lopez, state and declare:

2 1. I am a Plaintiff in the above captioned action and have personal knowledge of all
3 matters stated herein and could competently testify thereto. I make this declaration in support of
4 the motion for preliminary approval of the class action settlement. I believe that the settlement is
5 fair and reasonable and constitutes a fair resolution of the claims alleged.

6 2. When I first retained my attorneys (Lauby, Mankin & Lauby) and chose to pursue
7 this case on a class action basis, I understood that I had specific burdens as the “Class
8 Representative,” which included: (a) representing the interests of all class members, (2)
9 considering the interests of all class members above my own personal interests, (3) participating
10 actively in the lawsuit, including potential testimony at deposition and trial, and keeping
11 generally aware of the status and progress of the lawsuit. Moreover, I understood that any
12 resolution of the lawsuit is subject to court approval and must be designed in the best interests of
13 the class as a whole.

14 3. My claims are typical of the other employees (the class members) including those
15 at Dreamfields and its subsidiaries because we were all subjected to the same uniform practices
16 of the company in regard to payment of wages, calculation of the regular rate of pay and
17 overtime, meal and rest breaks, wage statements, along with other issues.

18 4. Since first initiating this action on behalf of the proposed class, I believe that I
19 have more than adequately performed my duties as a class representative. I have been an active
20 participant in this litigation, including assisting my attorneys in various ways and making myself
21 available when needed. For example, I have assisted my attorneys by compiling and analyzing
22 substantial documentation regarding the claims in this case. I have also helped to explain and
23 discuss the company’s practices and their general practices and procedures, locating and
24 analyzing company documents, among others. I have also reviewed all settlement documents and
25 believe that this settlement is fair for the class. Finally, I will continue to take all steps necessary
26 to finalize this settlement and obtain court approval.

27 5. I have no conflicts with the proposed class members and will continue to assist
28 with the litigation and prosecute the case on behalf of the other employees.

6. I respectfully request that the court preliminarily approve the service award. As outlined above, I have performed substantial services for the Class and I also undertook significant risks and stresses at a high emotional cost without any guarantee of success. Additionally, via my decision to bring this as a class action, and my active participation in the same, I helped obtain a highly beneficial settlement for my fellow employees. At the final approval stage, I will submit an additional declaration setting forth all the risks I took bringing this case, and listing the work I did for this case, including an estimated number of hours spent assisting the Class and my attorneys.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on Aug 5, 2025, at Morongo Valley, California.

By: 
Jayson (Aug 5, 2025 14:20:34 PDT)
Jayson Porras Lopez