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NEBILITY

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MARIA RETANA and MARGARITA MEDINA

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8 **SUPERIOR COURT OF CALIFORNIA**  
9 **FOR THE COUNTY OF SACRAMENTO**

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11 ROSEMERI AROSEMENA, MARIA  
RETANA, and MARGARITA MEDINA, as  
12 individuals and on behalf of all others  
similarly situated,

13  
14 Plaintiffs,

15 vs.

16 RANCHHODRAI INC., a California  
17 Corporation; KANJIBHAI PATEL, an  
individual; CHAMP PATEL, an individual;  
18 and DOES 1 to 100, inclusive,

19 Defendants.  
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Case No. STK-CV-UOE-2019-15963

**CLASS ACTION**

**DECLARATION OF ROSEMERI  
AROSEMENA IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY APPROVAL OF CLASS  
ACTION AND PAGA SETTLEMENT**

Date: April 5, 2024  
Time: 9:00 a.m.  
Dept.: 10A  
Judge: Hon. George J. Abdallah, Jr.

Filed: December 2, 2019  
FAC Filed: February 26, 2020  
SAC Filed: October 19, 2020  
Trial Date: None Set

FILE BY FAX

1 I, Rosemeri Arosemena, declare:

2 1. I am a competent adult, I have personal knowledge of the facts set forth in this  
3 declaration, and I am making this declaration on behalf of myself, as a named plaintiff, and in support  
4 of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement.

5 2. I worked for Defendants Ranchhodrai, Inc., Kanjibhai Patel and Champ Patel  
6 ("Defendants") from approximately June 2019 to September 2019, as a non-exempt employee. During  
7 my employment, I was subject to all of Defendants' policies and practices that have been alleged as  
8 unlawful in the Complaint, including the following: failure to pay overtime wages, failure to pay  
9 minimum wages, meal period violations, rest period violations, wage statement violations, waiting time  
10 penalties, and failure to reimburse expenses.

11 3. I have actively participated in the litigation of this case for the benefit of all Class  
12 Members. My attorneys explained to me the risks and benefits of bringing a class action and a claim  
13 under the Private Attorneys General Act ("PAGA"). I understood that pursuing the case as a class and  
14 PAGA action meant that it would take substantially longer than pursuing my claims individually,  
15 whether in Court or with the California Labor Commissioner, and that I risked getting nothing in the  
16 end, but I believed it was important to make sure that Defendants followed the law for everyone. I  
17 understood that I took on the risk, both professionally and financially, in pursuing the case as a class  
18 and PAGA action rather than pursuing my claims individually, including the risk of having to pay  
19 Defendant's costs if we were unsuccessful in bringing our claims.

20 4. During the course of this litigation, I have given detailed accounts of all the facts related  
21 to my employment. I provided my attorneys with extensive documentation that I believe supported the  
22 claims brought against Defendants. I met with and assisted my attorneys in understanding these  
23 documents and providing context for Defendants' employment policies and payroll process as it  
24 applied to me and how I believed it applied to Defendants' other employees.

25 5. The work I performed for this case included a review of documents and payroll practices  
26 to show and explain to my attorneys what was happening and why I thought it was unlawful. I went  
27 over Defendants' timekeeping practices, Defendants' policies regarding paying overtime, meal and rest  
28 period policies and practices, and the reimbursement policy with my attorneys to give them information

1 regarding unpaid hours, unpaid overtime premiums, why Class Members were unable to take all meal  
2 and rest periods, and expenses incurred that were not reimbursed to help reconstruct the timeline and  
3 facts consistent with our allegations. I also spent a substantial amount of time identifying potential  
4 witnesses who could speak to my attorneys to give their own insights and provide declarations.  
5 Overall, I have spent an enormous amount of time assisting in the prosecution of this case.

6 6. I participated in the negotiations and settlement discussions in this case, including  
7 participating in mediation by phone, and speaking with my attorneys to answer questions, provide any  
8 additional information needed to assist the negotiations, and discussing the potential terms of the  
9 Agreement to evaluate its adequacy. Throughout the course of this litigation I have asked questions  
10 when I needed clarification about various aspects of this case to make sure there were continually steps  
11 taken to advance the interests of Class Members.

12 7. Although I have already spent a substantial amount of time on this case and assisting my  
13 attorneys, I expect the amount of time I spend on this case will increase if preliminary approval is  
14 granted because Class Members will likely reach out to me about the Settlement and the process for  
15 receiving payment.

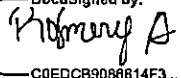
16 8. I have not received any benefits as a result of filing this lawsuit. I have, however,  
17 experienced substantial burdens as a result of filing the lawsuit that other Class Members were not  
18 subject to. For example, in bringing the lawsuit, I assumed the risk of having to pay Defendants' costs  
19 if the Court or jury rules against us on the claims. My understanding is that this is a substantial risk  
20 because the costs associated with litigation, in general, are very high and this cost is multiplied many  
21 times over in complex litigation like class actions. I have spent a substantial amount of time in this  
22 case, securing a monetary benefit for many individuals who have not had to do anything whatsoever to  
23 have the opportunity to receive it. I have been employed during the majority of the time this case has  
24 been pending. As a result, the time I have spent on this case has to occur during my lunch and/or  
25 breaks times, after hours, and on my days off. Rather than spend this time with friends and family, I  
26 have spent this time for the benefit of Class Members.

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9. I have reviewed the final Joint Stipulation of Class Action and PAGA Settlement and Release, discussed the terms with my attorney, and asked my attorney any questions I had. I believe the terms of the Settlement and allocations are fair and reasonable given the facts of the case.

10. I understand that any Class Representative Enhancement Payment I may receive is for my participation as a Class Representative and it is not contingent on my support or approval of the Agreement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 3/9/2024 in Stockton, California.

DocuSigned by:  
  
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Rosemeri Arosemena