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10 individually and on behalf of similarly situated employees

11 [additional parties continued on next page]

12 **SUPERIOR COURT OF CALIFORNIA**

13 **FOR THE COUNTY OF SAN JOAQUIN**

14 ELIZABET SANCHEZ and GRISELDA
15 RAMIREZ, individually and on behalf of all
16 other similarly situated employees,

17 Plaintiffs,

18 vs.

19 PACIFIC COAST PRODUCERS, a California
20 Corporation; and DOES 1 to 100, inclusive,

21 Defendants.

22 **Case No. STK-CV-UOE-2021-11106**

23 *Assigned for All Purposes to Hon. Robert T.
24 Waters, Department 11B*

25 **CLASS ACTION**

26 **DECLARATION OF GRISELDA RAMIREZ
27 IN SUPPORT OF PLAINTIFFS' MOTION
28 FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA SETTLEMENT**

Date: FEB 28 2024

Time: 9:00 a.m.

Dept.: 11B

Judge: Hon. Robert T. Waters

Filed: December 7, 2021

FAC Filed: February 14, 2022

SAC Filed: March 29, 2023

TAC Filed: September 19, 2023

Trial Date: None Set

FILED

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STEPHANIE BOHRER, CLERK

JESSICA CAYO

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Attorneys for Plaintiff GRISELDA RAMIREZ
individually and on behalf of similarly situated employees

1 I, Griselda Ramirez, declare:

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

5 2. I worked for Defendant Pacific Coast Producers (“Defendant”) from approximately August
6 2003 to August 6, 2022 as a non-exempt employee. My job consisted of quality control duties by grading
7 and testing tomatoes in Defendant’s lab, obtaining samples of tomatoes and grading the amount of salt
8 and acid present in the tomatoes, examining PH levels and temperatures of sauces, and examining cans
9 and other tomato products.

10 3. While I was working for Defendant, I became familiar with Defendant’s business practices,
11 which led me to believe that many of Defendant’s employees were being paid incorrectly, were not
12 receiving the legally required breaks, and were not being reimbursed business expenses, among other
13 things.

14 4. Before this class action lawsuit was filed, I came forward as a class representative. I spoke
15 at length with my attorneys about Defendant’s various employment practices, why I believed these
16 practices were illegal, and Defendant’s business operations.

17 5. When I decided to become involved in this lawsuit as a Class Representative, I understood
18 that I would be subjected to the stigma that is sometimes associated with people who bring these types of
19 lawsuits. I am aware that this action is public record and may appear on a background check, thereby
20 affecting my future employment prospects. I understood that the lawsuit could continue for several years
21 and require my attention and participation the entire time. I was made aware that I could become
22 responsible for some or all of Defendant’s legal costs if the case did not conclude successfully. Despite
23 these risks, I decided to serve as a Class Representative because it was the right thing to do.

24 6. I spent many hours working on this case before and after it was filed. During the pendency
25 of the case, I continued to provide my attorneys with information related to Defendant’s working
26 conditions including their practices and procedures. I also searched for and gathered information and
27 documents related to the case. I conferred with my attorneys on numerous occasions to provide insight
28 and perspective on this case as well as obtain updates regarding the action and to answer questions. I also

1 conferred with and identified class members who were willing to testify for purposes of class certification.
2 Further, I conferred with my attorneys regarding questions to be asked to Defendant for documents and
3 information related to this case.

4 7. I discussed the case in detail with my attorneys, including its potential strengths and
5 weaknesses. I believe that my thorough knowledge of Defendant’s practices assisted them in evaluating
6 the claims and assessing the potential damages.

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

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

13 I declare under penalty of perjury under the laws of the State of California that the foregoing is
14 true and correct. Executed on 1/22/2024 in woodland, California.

16 DocuSigned by:
17 *Griselda Ramirez*
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19 _____
20 Griselda Ramirez

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