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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF RIVERSIDE**

10
11 MARCOS BELTRAN, an individual and on
behalf of all others similarly situated;

12 Plaintiff,

13 vs.

14 FONDOMONTE CALIFORNIA, LLC, a
Delaware limited liability company; and DOES
15 1 through 50,

16 Defendants

Case No.: CVRI2402849

[Assigned for All Purposes to:
Hon. Harold W. Hopp, Dept. 1]

**DECLARATION OF MARCOS
BELTRAN IN SUPPORT OF MOTION
FOR APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT**

[Filed Concurrently with Motion for
Preliminary of Approval of Class Action and
PAGA Settlement, Notice of Filing Class
Action and PAGA Settlement Agreement,
Declarations in Support Thereof, and
[Proposed] Order]

DATE: February 10, 2026

TIME: 8:30 a.m.

DEPT: 1

Reservation No.: 897260667678

Action Filed: May 24, 2024

Trial Date: Not Set

1 I, MARCOS BELTRAN, hereby declare as follows:

2 1. I am an individual over the age of 18 year and the named Plaintiff in the above-
3 captioned matter. I have personal knowledge of the facts contained in this declaration, and if called
4 as a witness, could and would testify as to their accuracy.

5 2. I was formerly employed by Defendant FONDOMONTE CALIFORNIA, LLC
6 (“Defendant”) as an hourly-paid, non-exempt employee from approximately 2019 to approximately
7 December 2023 as a farm mechanic.

8 3. During my employment with Defendant, I was subjected to Defendant’s policies,
9 procedures, and practices at issue in this case. I sometimes worked off the clock as I waited in line
10 for up to 5 minutes to clock in and out. I did not receive all of my meal and rest periods. As a result
11 of these issues, I believe my paystubs did not accurately reflect the time I worked and the pay I
12 received and I did not receive all of my pay when I was terminated. I believe the same policies,
13 procedures, and practices affected other hourly employees of Defendant.

14 4. I do not believe I have any interests that are adverse to the other employees that are
15 part of this settlement.

16 5. I have not previously been a named plaintiff in any other class action cases, other
17 than this case.

18 6. I understand that the filing of this action was a matter of public record and that this
19 was being prosecuted on a class and representative basis. I understand that a class and
20 representative action would take longer in litigation than an individual action and undertook such
21 risks. I have not incurred any expenses, but have expended a significant amount of time on this
22 matter. During the course of this litigation, I have always made myself available to answer
23 questions, gather and provide documents, review and execute the settlement agreement and this
24 declaration. I will continue to make myself available to review any other documents needed to bring
25 this matter to conclusion. I estimate that I have spent around 20 hours in the prosecution of this
26 action.

27 7. As part of the Agreement, I understand that I will be providing a general release of
28 my own individual claims, something that the Settlement Class Members did not have to do.

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I declare, under penalty of perjury under the laws of the State of California, that the foregoing is true and correct.

Executed on October 20, 2025 at Blythe, California.



Marcos Beltran