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Attorneys for Plaintiff and the Proposed Classes

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

ERIC FELIX an individual, on behalf
of himself and others similarly situated

PLAINTIFF,

v.

WM. BOLTHOUSE FARMS, INC.;
and DOES 1 thru 50, inclusive,

DEFENDANTS.

CASE NO. 1:19-CV-00312-AWI-JLT

**DECLARATION OF ERIC FELIX IN
SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS
SETTLEMENT**

Magistrate Judge: Jennifer L. Thurston

DECLARATION OF ERIC FELIX

I, ERIC FELIX, state and declare as follows:

1. I am a competent adult, over the age of eighteen and the Class Representative Plaintiff in the matter of ERIC FELIX, an individual, on behalf of himself and others similarly situated v. WM. BOLTHOUSE FARMS, INC.; and DOES 1 thru 50, inclusive, Eastern District County Superior Court, Case No. 1:19-CV-00312-AWI-JLT. The foregoing is based upon my personal knowledge and, if called as a witness, I could and would competently testify thereto. I am making this sworn declaration in support of my claims and the claim of my co-workers, and in support of my qualifications as Class Representative. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I worked as an equipment operator for WM. BOLTHOUSE FARMS, INC. (“Defendant” or “Bolthouse”).

3. I have spent significant time throughout this class action working with Class Counsel. Before filing this action, in early 2019, I researched and identified Counsel that I believed could best represent the interests of the Class Members. I also assisted the attorneys with investigation and gathering of information including discussing my work experience and the experience of others that I had observed while working for Bolthouse and provided all relevant employment documents in my possession.

4. Throughout the entirety of this litigation, I have maintained regular contact with Class Counsel and assisted in any way possible by providing information and making myself available as needed.

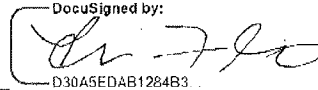
5. I was aware that by helping to initiate this lawsuit, my name would become known and it was possible that my involvement in this matter could make it more difficult for me to obtain employment in this field. Regardless, I believed it was important to proceed with this matter on my behalf and on behalf of all others who were subject to the same problems during their employment with Bolthouse.

6. Based upon my participation in this case, I understand the merits of this settlement and I strongly support the settlement and believe it is fair and reasonable, and in the

1 best interest of the class. I believe this Settlement will benefit the Class.

2 7. It is my opinion that a fair and adequate Class enhancement for me as a Class
3 Representative is \$5,000. I believe that it is fair and reasonable in view of all of the work I have
4 performed in my role as a Class Representative. As Class Representative, I actively participated
5 in all stages of the litigation as detailed above and have always maintained the best interest of the
6 Class while performing my Class Representative duties.

7
8 I declare under penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct. Executed this 4th day of November, 2019
10 at Delano, California.

11
12  DocuSigned by:
ERIC FELIX

13 ERIC FELIX
14 Declarant