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11 **UNITED STATES DISTRICT COURT**
12 **EASTERN DISTRICT OF CALIFORNIA**
13

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

16 **PLAINTIFF,**

17 v.

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

20 **DEFENDANTS.**

Case No. 1:19-cv-00312-AWI-JLT

**DECLARATION OF ERIC FELIX IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION 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 *ERIC FELIX v. WM. BOLTHOUSE FARMS, INC.* 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.

2. I am a former employee of Defendant WM. BOLTHOUSE FARMS, INC. (“Bolthouse” or “Defendant”). I performed work for Defendant in Bakersfield, California as an equipment operator from approximately June 2017 through July 2018.

3. I brought this lawsuit against Defendant on behalf of myself and other employees. I understand that I am representing other employees and I believe that I am able to represent them well.

4. Before and after the lawsuit was filed, I have spent significant time throughout this class action working with Class Counsel. Specifically, before filing this action, in early 2019, I spent a lot of time researching competent counsel that I believed could best represent the interests of the Class Members. Once I identified competent counsel, I spent time assisting and working with them by investigating and gathering information, including discussing my work experience and the experience of others that I observed while working for Bolthouse and providing all relevant employment documents in my possession.

5. Once we filed the lawsuit, I continued to help with the investigation and gathering of information. I also maintained regular contact with my attorneys to discuss the status of the case and regularly check in about the case’s progress. I made myself available as needed to assist in the prosecution of this case.

6. I was aware that by helping to initiate this lawsuit, my name would

1 become known and it was possible that my involvement in this matter could make it
2 more difficult for me to obtain employment in this field. Regardless, I believed it
3 was important to proceed with this matter on my behalf and on behalf of all others
4 who were subject to the same problems during their employment with Bolthouse.

5 7. I was apprised of the settlement process and all relevant discussions in
6 this matter. After the settlement was reached, I reviewed the final settlement
7 agreement and discussed it with my attorneys. We also discussed the next steps for
8 the case.

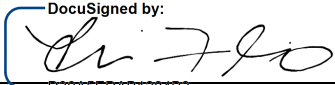
9 8. Based on my involvement in this case, I believe that the proposed
10 settlement is a good settlement for the Class. I support this settlement.

11 9. It is my opinion that a fair and adequate Class Representative
12 enhancement for me is \$5,000.00 as stated in the Settlement Agreement. I believe
13 that this amount is fair and reasonable in view of all of the work I have performed in
14 my role as a Class Representative. As Class Representative, I actively participated
15 in all stages of the litigation as detailed above and have always maintained the best
16 interest of the Class while performing my Class Representative duties.

17 I declare under penalty of perjury under the laws of the United States of
18 America that the foregoing is true and correct.

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Executed this 6th day of April, 2020 at Delano, California.

DocuSigned by:

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ERIC FELIX
Declarant