

EXHIBIT

8

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Taqueria El Primo LLC, Victor Manuel Delgado Jimenez, Michelle Chavez Solis, El Chinelo Produce, Inc., Virginia Sanchez-Gomez, Benjamin Tarnowski, on behalf of themselves and others similarly situated,

Plaintiffs,

v.

Farmers Group, Inc., Truck Insurance Exchange, Farmers Insurance Company, Inc., Farmers Insurance Exchange, Illinois Farmers Insurance Company, and Mid-Century Insurance Company,

Defendants.

Case No. 19-CV-03071 (JRT/ECW)

**DECLARATION OF VICTOR
MANUEL DELGADO JIMENEZ OF
TAQUERIA EL PRIMO LLC IN
SUPPORT OF MOTION FOR
PAYMENT OF ATTORNEYS' FEES,
LITIGATION EXPENSES, AND
SERVICE AWARDS**

I, Victor Manuel Delgado Jimenez, hereby declare and state as follows:

1. I am a Named Plaintiff in this litigation. I am also the owner of Taqueria El Primo LLC, one of the Court-appointed Class Representatives for the Damages Class. *See* ECF No. 318 at 61.

2. I am making this declaration at the request of my counsel and in support of the of Class Counsel's Motion for Payment of Attorneys' Fees, Litigation Expenses, and Service Awards filed in this matter ("Motion"). I have first-hand knowledge of the matters addressed in this declaration, and, if called as a witness, I could competently testify to them.

3. I have been a resident of the State Minnesota during the Class Period in this case.

4. During the Class Period in this case, Taqueria El Primo LLC and I purchased at least one insurance policy within the State of Minnesota from at least one of the Defendant Insurers that provided for medical expense benefits under Minnesota's No Fault Act.

5. Taqueria El Primo LLC and I have participated fully in this litigation and acted in the best interests of the entire Damages Class. These activities included retaining the attorneys appointed as Class Counsel, advising attorneys, approving pleadings and settlements, reviewing and responding to written discovery, preparing for and sitting for a deposition, searching for, collecting, preserving, and producing documents. Since the inception of this litigation, I have dedicated 60 hours to this litigation.

6. Taqueria El Primo LLC and I respectfully request the Court to grant Counsel's Motion in its entirety.

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

Dated: 5-13-25

VICTOR M. DELGADO

Victor Manuel Delgado Jimenez