

EXHIBIT

9

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 VIRGINIA
SANCHEZ-GOMEZ IN SUPPORT OF
MOTION FOR PAYMENT OF
ATTORNEYS' FEES, LITIGATION
EXPENSES, AND SERVICE AWARDS**

I, Virginia Sanchez-Gomez, hereby declare and state as follows:

1. I am one of the Court-appointed Class Representatives for the Damages Class and the Injunctive Class. *See* ECF 318 at 61. I own El Chinelo Produce, Inc., which is one of the Court-appointed Class Representatives for the Damages Class. *Id.* Additionally, I own El Chinelo Market LLC, which is one of the Court-appointed Class Representatives for the Injunctive Class. *Id.* El Chinelo Produce, Inc. and El Chinelo Market LLC are collectively known as “the El Chinelo businesses.”

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 was a resident of the State Minnesota for the entire Settlement Class Period in this case: January 17, 2013 – Sept. 13, 2023.


4. During the Settlement Class Period in this case, the El Chinelo business and I each 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. The El Chinelo businesses and I have participated fully in this litigation and acted in the best interests of the entire Damages Class and the Injunctive 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, the El Chinelo business and I have dedicated 65.5 hours to this litigation.

6. The El Chinelo businesses 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: 5/13/2025



Virginia Sanchez-Gomez