

BRADLEY/GROMBACHER, LLP

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Attorneys for Plaintiff, JAZMIN ALEJO, individually
and on behalf of other individuals similarly situated

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA CLARA**

JAZMIN ALEJO, individually and on behalf of
other individuals similarly situated,

Plaintiff,

v.

PACKARD CHILDREN'S HEALTH
ALLIANCE, a California nonprofit corporation;
and DOES 1 through 100, inclusive

Defendant.

CASE NO. 20CV366750

[Assigned to Hon. Beth McGowen, Dept. 22]

CLASS ACTION

**DECLARATION OF MARCUS J.
BRADLEY IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

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1 Schwartz, Daniels & Bradley. On September 1, 2016, I formed Bradley/Grombacher LLP with
2 former associate at Marlin & Saltzman, Kiley Grombacher.

3 6. I have been responsible for all facets of class action employment and other complex
4 litigation, from pre-filing investigation through trial and appeal. Since approximately May 2000, I
5 have spent most of my time representing workers in wage and hour matters. I, along with my current
6 and former partners, have litigated these issues in class actions to favorable settlements that have
7 recouped over \$800,000,000.00 in unpaid wages, including the following more notable cases:

- 8 a. *Gutierrez v. State Farm Mutual*, Los Angeles Superior Court (BC236552). Class action
9 mis-classification case seeking overtime compensation for approximately 2,600 insurance
10 claims adjusters employed by State Farm. The class was certified and summary
11 adjudication was granted as to liability in favor of the class. The case settled for \$135
12 million just prior to trial, with final approval granted with no objections filed.
- 13 b. *Bednar v. Allstate Insurance Company*, Los Angeles Superior Court (BC240813). Class
14 action mis-classification case seeking overtime compensation for approximately 1,200
15 insurance claims adjusters employed by Allstate. The class was certified and summary
16 adjudication was granted as to liability in favor of the class. The case settled for \$120
17 million just prior to trial, with final approval granted with no objections filed.
- 18 c. *Roberts v. Coast National Insurance*, Orange County Superior Court (01CC08478). Class
19 action mis-classification case seeking overtime compensation for insurance claims
20 adjusters employed by Coast National Insurance. Certification granted, and then the
21 matter was tried before a binding arbitrator. The case settled during the arbitration for an
22 excess of \$18 million.
- 23 d. *CNA Class Action Litigation*, Los Angeles Superior Court Class (JCCP 4230). Class
24 action mis-classification case seeking overtime compensation for insurance claims
25 adjusters employed by Defendant. Case settled for \$33 million, with final approval
26 granted with no objections filed.
- 27 e. *Dotson v. Royal SunAlliance*, Orange County Superior Court (02CC01787). Class action
28 mis-classification case seeking overtime compensation for insurance claims adjusters

employed by Royal SunAlliance. Case settled for \$12.3 million, with final approval granted with no objections filed.

- f. *Parris v. Lowe's Home Improvement*, Los Angeles County Superior Court (BC260702). Class action seeking payment of "off-the-clock" hours worked by all hourly employees of Lowe's Home Improvement stores in the State of California. The class was certified by the Court of Appeal and remanded to the trial court for further proceedings. Shortly thereafter, a \$29.5 million settlement was reached and approved without objection.
- g. *Pardo v. Toyota Motor Sales, et al.* Los Angeles County Superior Court (BC372781). Class action mis-classification of workers with claims for overtime and missed meal and rest breaks. The case settled for \$7.75 million and was approved with no objections.
- h. *Smith/Ballard v. Wal-Mart Stores, Inc.* United States District Court for the Northern District of California (Case No. 4:06-cv-05411-SBA). Wage and hour class action seeking unpaid vacation and personal time, unpaid wages, and related penalties on behalf of over 245,000 employees. The action was certified and settled for \$86 million while Defendant's appeal of the certification was pending in the Ninth Circuit Court of Appeals.
- i. *Hoyng v. AON*, Los Angeles County Superior Court (BC377184). Wage and hour class action seeking overtime and related compensation for mis-classification on behalf of Relationship and Account Specialists. The case settled for \$10.5 million which was approved with no objections filed.
- j. *In RE Bank of America Wage and Hour Employment Practices Litigation*, MDL 2138, United States District Court for the District of Kansas. California state and FLSA wage and hour litigation for various violations including unpaid overtime and "off-the-clock" work. Settled for \$73 million.
- k. *Lemus v. H & R Block Litigation*, United States District Court for the Northern District of California (Case No. 3:09-cv-03179-SI) Class certified, and settlement reached prior to trial. Total settlement of \$35 million.
- l. *Harris v. Vector Marketing Corporation*, United States District Court for the Northern District of California (Case No. 3:08-cv-05198-EMC). Class action case on behalf of

1 approximately 70,000 employees misclassified as “trainees.”

2 *m. Bickley v. Schneider National Trucking*, United States District Court for the Northern
3 District of California (Case No. 4:08-cv-05806-JSW). Wage and hour class action on
4 behalf of approximately 6,000 truck drivers. Settled for \$29.5million.

5 *n. Roberts v. TJX*, United States District Court for the Northern District of California (Case
6 No. 13-CV-04731-MEJ). Wage and hour violations on behalf of approximately 82,000
7 employees. Settled for \$8.5 million.

8 *o. Oprychal v. New York Life Insurance*, United States District Court for the Central District
9 of California (Case No. 2:07-cv-00518-VBF). Class action for the failure to pay
10 commissions pursuant to a compensation plan. Settled for \$10 million.

11 *p. Neuvenheim v. Gamestop Corp.*, United States District Court for the Central District of
12 California (Case No. 2:09-cv-06799-ODW). Class action on behalf of nonexempt
13 employees for wage and hour violations.

14 *q. Hightower v. JP Morgan Chase*, United States District Court for the Central District of
15 California (Case No. 2:11-cv-01802-PSG). Class action on behalf of nonexempt
16 employees for wage and hour violations. Settled for \$12 million.

17 7. On many of the above cases, I was either lead or co-lead counsel including cases in
18 multi-district litigation or coordinated proceedings where I worked collaboratively and cooperatively
19 with co-counsel to bring about an efficient and beneficial resolution for all class members as the
20 above results demonstrate.

21 8. I have argued cases in trial courts as well as before courts of appeal. My writings on
22 legal topics pertaining to litigating wage and hour class and representative actions have appeared in
23 professional publications, and I have been called upon to speak at conferences and seminars for
24 professional organizations, including a recent presentation titled “Planning for and Executing Trial
25 in Class and Collective Wage & Hour Cases.”

26 9. I have also been honored as a Super Lawyer in the area of class actions by Los Angeles
27 Magazine for multiple years including 2026. I have also been named a Top 100 Commercial Litigator
28 by the *Los Angeles Daily Journal* for the past two years as well as a Consumer Attorney Visionary

1 by the *Los Angeles Times*. I am also a member of a number of professional organizations, including
2 the Consumer Attorneys of Los Angeles, the Consumer Attorneys of California, the California
3 Employment Lawyers Association, and the American Association for Justice.

4 10. My Partner, Ms. Grombacher, specializes her practice in complex litigation including
5 consumer and employment class actions. She has litigated hundreds of employment and consumer
6 class actions throughout her career which began at Arias, Ozzello & Gignac where she gained
7 extensive experience litigating consumer cases.

8 11. Thereafter, Ms. Grombacher joined Marlin & Saltzman in 2010 where she focused
9 her practice almost exclusively on wage and hour, collective and representative actions including
10 the reported case, *Faulkinbury v. Boyd & Associates*, which clarified the holding in seminal case,
11 *Brinker Restaurant Corp. v. Superior Court*, to establish that legality of certain company policies
12 could be determined on a class-wide basis even if the application of the policies varies by individual.

13 12. Ms. Grombacher has been selected by Super Lawyers Magazine as a “Rising Star” in
14 the field of complex litigation since 2015 and as a Super Lawyer since 2017. She has published
15 articles on the field of class action litigation including “A Class-Action Primer” which appeared in
16 *The Advocate*, which is the Journal of Consumer Attorneys of Southern California.

17 13. Ms. Grombacher has also lectured on various topics involving complex case
18 management and recently spoke at the Beverly Hills Bar Association’s Class Action and Complex
19 Case Management Conference. She is also a member of a number of professional organizations,
20 including the Consumer Attorneys of Los Angeles and the American Association for Justice.

21 I declare under penalty of perjury under the laws of the State of California that the foregoing
22 is true and correct and based on my personal knowledge.

23 Executed on March 24, 2026, in Westlake Village, California.

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25 /s/ Marcus J. Bradley
26 Marcus J. Bradley
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