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by Superior Court of CA,
County of Santa Clara,
on 3/7/2023 1:25 PM
Reviewed By: R. Walker
Case #21CV376175
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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

TERRAL BROWN, individually, and on
behalf of other aggrieved employees pursuant
to the California Private Attorneys General
Act;

Plaintiff,

vs.

BALFOUR BEATTY INFRASTRUCTURE,
INC., an unknown business entity; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 21CV376175

Honorable Theodore C. Zayner
Department 19

**DECLARATION OF TERRAL BROWN
IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF
PRIVATE ATTORNEYS GENERAL
ACT (CAL. LAB. CODE § 2698, ET SEQ.)
SETTLEMENT AGREEMENT AND
AWARD OF ATTORNEY'S FEES AND
COSTS, GENERAL RELEASE FEE,
AND SETTLEMENT
ADMINISTRATION COSTS**

[Notice of Motion and Motion for Approval
of Private Attorneys General Act (Cal. Lab.
Code § 2698, Et Seq.) Settlement
Agreement and Award of Attorney's Fees
and Costs, General Release Fee, and
Settlement Administration Costs;
Declaration of Plaintiff's Counsel (Edwin
Aiwaazian); and [Proposed] Order and
Judgment filed concurrently herewith]

Date: March 29, 2023
Time: 1:30 p.m.
Department: 19

Complaint Filed: February 17, 2021
Jury Trial: None Set

DECLARATION OF TERRAL BROWN

I, **Terral Brown**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case, and I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendant Balfour Beatty Infrastructure, Inc. (“Balfour Beatty”) at various periods from approximately September 2018 to approximately November 2019 as a non-exempt, hourly-paid employee. I decided to seek legal advice about my work experiences at Balfour Beatty and about filing a lawsuit to seek to redress my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure Balfour Beatty was held accountable for not properly compensating aggrieved employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately **6 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for almost **5 hours** discussing my situation, representative action lawsuits under the Private Attorneys General Act (“PAGA”), and what it meant to bring a PAGA action.

3. I have spent over **25 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a PAGA representative, which has included gathering and providing documents concerning my employment with Balfour Beatty, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of other hourly-paid or non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Balfour Beatty. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and to provide them with any additional information that I had obtained.

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1 4. Throughout my involvement in this case, I was available to answer any questions
2 my attorneys had, and available to speak and meet with my attorneys whenever they needed me.
3 I responded to them as quickly as possible and gave them as much information as I could.
4 I spent at least **10 hours** speaking with my attorneys about the case, sending them documents,
5 identifying potential witnesses, and also describing policies, practices, and procedures of Balfour
6 Beatty.

7 5. I spent about **2 hours** reviewing the settlement agreement and about **2 hours**
8 asking questions and discussing the potential settlement with my attorneys before signing the
9 settlement agreement.

10 6. I believe that I have done everything that my attorneys have asked of me and
11 tried, to the best of my ability, to seek relief for the aggrieved employees and the State of
12 California. I think my efforts helped to get the result obtained in this case.

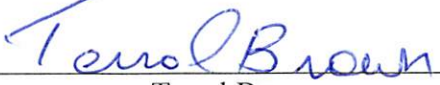
13 7. I respectfully request that the Court approve and award me a general release fee in
14 the amount of \$7,500.00 for my efforts and active participation in the case and broader release of
15 claims. Taking into consideration the time that I dedicated to this case, I believe that this amount
16 is reasonable.

17 8. I am not related to anyone associated with Lawyers for Justice, PC.

18 9. I have not entered into any undisclosed agreements, nor have I received any
19 undisclosed compensation in this case. The only compensation I will receive is a general release
20 fee, if approved by the Court, as well as my share of the settlement as an aggrieved employee.

21 I declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct.

23 Executed this 25 day of October 2022, at Newark, California.

24 
25 Terral Brown