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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO

WENDIE BRANDT, as an individual and on
behalf of all others similarly situated, and as a
private attorney general,

Plaintiff,

vs.

KIDS CARE DENTAL & ORTHODONTICS, a
California corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 34-2021-00296816

[Assigned for all purposes to Department 25,
Hon. Jill H. Talley]

**DECLARATION OF WENDIE BRANDT IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: May 5, 2023
Time: 9:00 a.m.
Department: 25

Complaint Filed: September 1, 2021

1 I, Wendie Brandt, declare as follows:

2 1. I am an individual over the age of 18. I am the named plaintiff in the above-reference
3 action. I have personal knowledge of the facts set forth below, except as to those matters stated on
4 information and belief and, as to those matters, I believe them to be true. If called as a witness, I could
5 testify competently as to the matters stated in this declaration.

6 2. I began working for Kids Care Dental & Orthodontics around March of 2016. Until my
7 employment as a Dental Patient Coordinator ended around December of 2020, I was paid on an hourly
8 basis as a non-exempt employee. I was required to purchase work uniform with the Company's logo and
9 to maintain and clean the work uniform on my own time and at my own expense. I was not reimbursed
10 for the costs of purchasing, maintaining, or cleaning the work uniform.

11 3. When I reported to work, I also was required to spend several minutes per day booting up
12 the Company's computers then accessing an ADP application before being able to clock in to report my
13 work hours.

14 4. I am informed and believe that I was neither timely paid nor ever paid minimum wages or
15 overtime wages for my work time spent maintaining and cleaning my work uniform or for my work time
16 booting up the Company's computers and accessing the ADP application. I am also informed and
17 believe that I received itemized wage statements that inaccurately stated my total hours worked, number
18 of hours worked at each applicable hourly rate, gross wages earned, and net wages earned.

19 5. I have taken all necessary steps to represent the interests of the Class, including by
20 providing information and documents to my counsel, discussing the claims and lawsuit with my counsel,
21 and answering any questions that have come up. I remain willing to devote my time to this lawsuit for
22 the benefit of the Class. I do not believe I have any interests that are adverse to the interests of the Class.
23 I also am unaware of any such issues having been raised or presented by anyone else.

24 6. I believe many employees would not sue their employer out of fear. I took on risks by
25 bringing this lawsuit, and I understand that other people will benefit because of the actions that I have
26 taken. I feel that it is a positive accomplishment, am proud of the result, and believe that the class
27 settlement is fair, adequate, and reasonable.
28

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct. Executed this 5 day of April 2023, at Valley Springs, California.

3 *Wendie Brandt*

ID TaeV2Rnoh9D2bvWicWJ2odTG

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Wendie Brandt