

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

Norman B. Blumenthal (SBN #068687)
Kyle R. Nordrehaug (SBN #205975)
Aparajit Bhowmik (SBN #248066)
Christine T. LeVu (SBN 288271)
Brooke W. Waldrop (SBN 314486)
Adolfo Sanchez Contreras (SBN 354371)
2255 Calle Clara
La Jolla, CA 92037
Telephone: (858) 551-1223
Facsimile: (858) 551-1232

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN DIEGO**

JAMES HYLAND, an individual, on
behalf of the State of California, as a
private attorney general,

Plaintiff,

vs.

BEST BUY HEALTH, INC., a
Corporation, and DOES 1 through 50,
inclusive,

Defendants.

Case No.: **37-2021-00030211-CU-OE-CTL**

**SUPPLEMENTAL DECLARATION OF
BROOKE WILKINSON WALDROP IN
SUPPORT OF MOTION TO APPROVE
PAGA SETTLEMENT**

Hearing Date: November 7, 2025
Hearing Time: 9:00 a.m.

Judge: Hon. Matthew C. Braner
Dept.: C-60

Action Filed: July 15, 2021
Trial Date: Not Set

SUPPLEMENTAL DECLARATION OF BROOKE WILKINSON WALDROP

I, Brooke Wilkinson Waldrop, declare as follows:

1. I am an associate in the law firm of Blumenthal Nordrehaug Bhowmik De Blouw LLP, attorneys for Plaintiff James Hyland (“Plaintiff”). As such, I am fully familiar with the facts, pleadings and history of this matter. I am submitting this declaration in support of the Plaintiff’s Motion to Approve PAGA Settlement in this matter. The following facts are within my own personal knowledge, and if called as a witness, I could and would testify competently to the matters stated herein.

2. Plaintiff's Motion to Approve PAGA Settlement was filed in this court on October 14, 2025.

3. Plaintiff and Defendant Best Buy Health, Inc. have finalized a Notice of PAGA Settlement that the Settlement Administrator will include with each Individual PAGA Payment. A true and correct copy of the Notice of PAGA Settlement is attached as Exhibit #1.

4. I submit this supplemental declaration and Exhibit #1 in support of Plaintiff's Motion to Approve PAGA Settlement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 21st day of October, 2025, at Burbank, California.

/s/ Brooke Wilkinson Waldrop
Brooke Wilkinson Waldrop

EXHIBIT 1

NOTICE OF PAGA SETTLEMENT

Hyland v. Best Buy Health, Inc.,

Superior Court of the State of California, County of San Diego, Case No. 37-2021-00030211-CU-OE-CTL

ILYM Group, Inc.

P.O. Box _____

Telephone: _____

«Barcode»

«BarcodeString»

SIMID «SIMID»

«FirstName» «LastName»

«Address1» «Address2»

«City» «State» «Zip»

You are receiving this notice as a result of a lawsuit brought on a representative basis under the California Private Attorneys General Act, Labor Code § 2698 *et seq.* (“PAGA”) by Plaintiff James Hyland (“Plaintiff”) acting in a private attorney general capacity against Defendant Best Buy Health, Inc. (“Defendant”) (the “Action”). Through the Action, Plaintiff sought to recover civil penalties for purported violations of the California Labor Code on behalf of the State of California for all individuals who are or previously were employed by Defendant in California and classified as a non-exempt employee at any time during the PAGA Period (the “Aggrieved Employees”). The PAGA Period is the period from July 15, 2020 and ending March 1, 2025.

Defendant denies all claims and allegations in the Action, denies that it owes any penalties to the State of California, Plaintiff, and/or the Aggrieved Employees, and asserts that it has fully complied with all applicable Labor Code and all other provisions of law noted below. Nevertheless, to avoid further costs and time in defending the Action, Defendant has settled the Action, and the Court has approved the settlement and release of all “Released PAGA Claims” against Defendant by Plaintiff, the State of California, and Aggrieved Employees. “Released PAGA Claims” are all claims for PAGA penalties during the PAGA Period that were alleged, or reasonably could have been alleged, based on the facts stated in, and that involve the same primary rights as those placed at issue by, the Operative Complaint and the PAGA Notice submitted by Plaintiff to the LWDA, including but not limited to PAGA claims premised on the alleged failure to pay minimum wages, failure to pay overtime or pay overtime at the correct rate of pay, failure to pay wages within required time periods, failure to pay for all hours worked (off-the-clock work and/or time rounding), failure to pay reporting time pay, failure to pay vacation pay, failure to maintain timekeeping and payroll records, failure to pay all sick time or paid sick leave, failure to pay sick time or paid sick leave at the correct rate of pay, failure to provide meal and rest periods, failure to pay meal or rest period premiums at the correct rate of pay, failure to timely pay wages and final wages, failure to provide accurate wage statements, failure to provide suitable seating, failure to reimburse employees for necessary business expenses, violation of Labor Code Section 351, and alleged unlawful deductions from pay. By Judgment dated _____, 2025, the Superior Court of California for the County of San Diego approved the settlement of the Action and the Released PAGA Claims.

According to the Defendant’s records, you are or previously were employed by Defendant in California and classified as a non-exempt employee during some or all of the PAGA Period and thus are an Aggrieved Employee. Therefore, through the settlement, and the Court’s order approving the settlement, your Released PAGA Claims have been fully, finally, and forever released and you are eligible to receive an Individual PAGA Payment under the Court-approved allocation which is based upon the pay periods you worked during the PAGA Period. The enclosed settlement check shall remain valid for 180 days after mailing. After the void date, the Administrator shall transmit the funds represented by such checks to the Legal Aid at Work consistent with Code of Civil Procedure Section 384(b).

Please Note: One hundred percent (100%) of your payment will be considered civil penalties, and may be reported to the IRS and applicable state tax authorities. You should rely on your own tax advisors as to the tax consequences of your Individual PAGA Payment. Neither Plaintiff nor Defendant have made or will make any representations or warranties regarding the taxation of your Individual PAGA Payment. Nothing within this notice

NOTICE OF PAGA SETTLEMENT

or any other communication shall constitute or be construed or relied upon as tax advice within the meaning of United States Treasury Department Circular 230 (31 C.F.R. Part 10, as amended).

Do not call or write the Court or Office of the Clerk to ask questions about the settlement or your Individual PAGA Payment. If you have any questions, you may call or write to ILYM Group (the Administrator) using the contact information at the top of this correspondence.

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

I, Yesenia Silva, am a citizen of the United States and a resident of the State of California. I am employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action. My business address is 2255 Calle Clara, La Jolla, California 92037. On October 21, 2025, I served the document(s) described as:

1. SUPPLEMENTAL DECLARATION OF BROOKE WILKINSON WALDROP IN SUPPORT OF MOTION TO APPROVE PAGA SETTLEMENT

X (ONLINE TO THE LWDA): I caused the above-described document to be delivered to the Labor Workforce Development Agency via online process at the PAGA Filing website in accordance with the procedure imposed by the LWDA.

X (BY ELECTRONIC SERVICE): I provided the documents referenced above electronically via electronic mail (e-mail) to counsel for Defendants at the following e-mail address(es):

MORGAN, LEWIS & BOCKIUS LLP

Christopher J. Taylor

christopher.taylor@morganlewis.com

Barbara J. Miller

Barbara.miller@morganlewis.com

Kevin Bohmn

Kevin.bohm@morganlewis.com

Patricia Martin

Patricia.martin@morganlewis.com

Juanita Robles

Juanita.robles@morganlewis.com

600 Anton Boulevard, Suite 1800

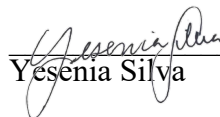
Costa Mesa, CA 92626-7653

Main: +1.714.830.0600

Fax: +1.714.830.0700

X (State): I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 21, 2025, at San Diego, California.


Yesenia Silva