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Attorneys for Plaintiffs

Rachel Gillett and Derek Brumbaugh

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

Tina Lundin, individually, and on behalf
of other members of the general public
similarly situated; Derek Brumbaugh,
individually and on behalf of other
members of the general public similarly
situated and on behalf of other aggrieved
employees pursuant to the California
Private Attorneys General Act;

Plaintiffs,

vs.

Anaheim Transportation Network DBA
Anaheim Resort Transportation, a
California corporation; and DOES 1-50,
inclusive,

Defendants.

Case No.: 30-2021-01204870-CU-OE-CXC

Honorable Randall J. Sherman
Department CX-105

**DECLARATION OF DEREK
BRUMBAUGH IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL**

[Plaintiffs' Unopposed Motion for Preliminary
Approval of Class Action Settlement;
Declaration of Proposed Class Counsel
(Danielle L. GruppChang); Declaration of Tina
Lundin; and [Proposed] Order filed
concurrently herewith]

Reservation No.: 74290989
Date: August 2, 2024
Time: 10:00 a.m.
Department: CX-105

Complaint Filed: June 4, 2021
FAC Filed: March 28, 2024
Trial Date: None Set

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1 not know the answer. I provided information about other non-exempt, hourly-paid employees,
2 including but not limited to their job titles and job duties, policies which effected all employees,
3 and what I had witnessed other employees experience at work. I described ATN's practices and
4 policies for my attorneys at length. I spent at least 6 hours on my own looking for additional
5 documents and gathering information to provide to my attorneys about ATN.

6 5. I made myself available all day on the day of the mediation and spent about 3
7 hours beforehand discussing what a potential settlement of the action would include with my
8 attorneys. I spent about 6 hours reviewing the settlement agreement and about 2 hours asking
9 questions and discussing the potential settlement with my attorneys before signing the settlement
10 agreement.

11 6. I answered all of my attorneys' questions as well as I could, provided them with
12 all of the relevant information I had as well as all of the documentation I could gather, researched
13 each aspect of the lawsuit to the best of my ability, and did everything else my attorneys asked of
14 me. I believe I did everything I could to get a fair result for the other employees and the state of
15 California. I think everything I did helped to get the result obtained in this case.

16 7. I respectfully request that the Court approve and award me a Class Representative
17 Service Payment in the amount of \$7,000.00 for my efforts and active participation in the case.
18 Taking into consideration the time that I dedicated to this case, I believe that this amount is
19 reasonable.

20 8. I am not related to anyone associated with Brock & Gonzales, LLP.

21 9. I have not entered into any undisclosed agreements or received any undisclosed
22 compensation in this case.

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

25 Executed on 15/04/2024, at Norwalk, California.

26
27 
Derek Brumbaugh (Apr 15, 2024 21:30 PDT)

Derek Brumbaugh