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Attorneys for Plaintiffs, PARADICE BROOKS

SUPERIOR COURT FOR THE STATE OF CALIFONRIA
COUNTY OF SAN BERNARDINO

PARADICE BROOKS, IGNACIO GOMEZ,
GAIL ANN GAINES, on behalf of themselves
and all other similarly situated persons,

Plaintiffs,

vs.

BIG BANG ENTERPRISES, INC. dba THE
RETAIL OUTSOURCE; BIG BANG
ENTERPRISES, INC.; and DOES 1-50,
inclusive,
Defendants.

CASE NO. CIVSB2135167

**DECLARATION OF PARADICE
BROOKS IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

I, PARADICE BROOKS, hereby state and declare as follows:

1. My name is Paradise Brooks, and I am one of the named Plaintiffs and Class Representatives in this lawsuit. I understand what this case is about and have been involved in it from the start. Everything I say below is based on what I personally know, and I would be able to testify to these facts if asked to.

2. I worked for Big Bang Enterprises, Inc. as a non-exempt hourly employee of Defendant throughout my employment with Defendant which was within the Class Period.

3. The purpose this case was to recover unpaid wages, premiums for meal and rest break violations, reimbursement of business expenses, penalties for inaccurate wage statements, and penalties for labor code violations. I'm bringing this case on behalf of current and former employees of Defendant who worked as non-exempt employees.

4. I first contacted Mr. Nathan in 2021 to pursue a reimbursement case because I believed Defendant was engaging in illegal conduct. I retained Nathan & Associates in October 2019 as my attorneys who filed the initial lawsuit Brooks v. Big Bang Enterprises, et al.

5. I assisted my attorneys by providing them documents, pay stubs, and my employment file. I also reviewed those documents I located and provided to my attorneys, by myself and with my attorneys.

6. I also spent a significant amount of time over the course of several months contacting witnesses and former employees and shared the information with my attorneys.

7. In this initial case, I responded to written discovery and reviewed discovery produced by Defendant. In 2021, I also attended a mediation that did not result in a settlement.

8. Shortly after the failed mediation, I learned that there were 2 other cases filed against Defendant.

9. Per an agreement, the cases were consolidated in this Court.

10. Since becoming a Class Representative, I have performed my duties by working on this case. I always answer my attorney's phone calls and have been available throughout this case to attorneys via Zoom.

11. I have responded to multiple sets of written discovery in both cases and have been prepared for my deposition to be taken on three (3) different occasions.

11 14. I consented to the terms of the settlement and executed the settlement agreement.

13 16. I believe a \$10,000 class representative enhancement payment is reasonable. I understand
14 that this additional payment is not guaranteed and is subject to Court approval.

17 Executed on November 18, 2025, at Livermore, California.

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