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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MERCED**

KAYLYN BUSH and MADELEINE
GUEVARA, on behalf of themselves, and all
aggrieved employees,

Plaintiffs,

v.

DUTCH BROS., LLC; and DOES 1 through
100, inclusive,

Defendants.

Case No: 22CV-01415

REPRESENTATIVE ACTION

*Assigned for all purposes to the
Hon. Brian McCabe, Dept. 8*

**DECLARATION OF ROBERT SPENCER
IN SUPPORT OF MOTION FOR AN
ORDER APPROVING SETTLEMENT OF
PAGA ACTION AND DISMISSING
ACTION WITH PREJUDICE**

Date: December 13, 2023

Time: 8:15 a.m.

Dept. 8

Complaint filed: May 19, 2022

Trial Date: TBD

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1 I, ROBERT SPENCER, declare as follows

2 1. I am an attorney duly admitted to the practice of law in the State of California. I
3 am an associate with the law firm Keller Grover LLP, counsel for Plaintiff Kaylyn Bush in this
4 action. I have personal knowledge of the facts stated herein and, if called as a witness, I could
5 and would testify competently to the facts set forth below.

6 2. On October 27, 2023, I personally uploaded the following documents to the
7 LWDA website: 1) Plaintiffs' Notice of Motion and Motion for an Order Approving Settlement
8 of PAGA Action and Dismissing Action with Prejudice and Memorandum of Points and
9 Authorities in Support Thereof, 2) Plaintiffs' Notice of Motion and Motion for an Order
10 Awarding Attorneys' Fees and Cost, Enhancement Payments, and Settlement Administration
11 Fees, 3) Declaration of Eric A. Grover in Support of Motions for an Order Approving
12 Settlement of PAGA Action and Dismissing Action with Prejudice and for an Order Awarding
13 Attorneys' Fees, Costs, Enhancement Payments and Settlement Administration Fees, 4)
14 Declaration of Vincent Granberry in Support of Motion for an Order Approving Settlement of
15 PAGA Action, 5) Declaration of Kaylyn Bush, 6) Declaration of Madeleine Guevara, 7) the
16 parties' Labor Code Private Attorneys General Act Settlement Agreement, 8) the proposed
17 order, and 9) this declaration.

18 I declare under penalty of perjury under the laws of the State of California and the United
19 States that the foregoing is true and correct, and that this Declaration was executed on this 27th
20 day of October, 2023 at San Francisco, California.

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22 /s/ Robert Spencer
23 ROBERT SPENCER
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PROOF OF SERVICE

I, JOEY GONZALEZ, am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1965 Market Street, San Francisco, California 94103. On **October 27, 2023**, in the case of *Bush, et al., v. Dutch Bros., LLC, et al.*, Merced Superior Court Case Number 22CV-01415, I served the foregoing document(s):

DECLARATION OF ROBERT SPENCER IN SUPPORT OF MOTION FOR AN ORDER APPROVING SETTLEMENT OF PAGA ACTION AND DISMISSING ACTION WITH PREJUDICE

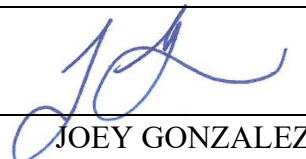
on the interested party(ies) below, using the following means:

Robert J. Wilger, Esq. *Attorneys for Defendant*
Benjamin A. Emmert, Esq. **DUTCH BROS., LLC**

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☒	(BY ELECTRONIC SERVICE) by electronically mailing a true and correct copy in PDF format through our electronic mail system to the email address(es) set forth above, or as stated on the attached service list per agreement between the parties.
☒	(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.


JOEY GONZALEZ