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Attorney for Plaintiff JOSEF BERNSTEIN

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JOSEF BERNSTEIN, as an individual
and on behalf of other similarly situated
employees,

Plaintiff,

vs.

PAYREEL, INC., a Colorado
corporation, ANHEUSER-BUSCH,
LLC, a Missouri corporation,
1600 OVER 90, ENDEAVOR
OPERATING COMPANY, LLC, a
Delaware corporation, and DOES 1-50,
inclusive,

Defendant.

Case No. 2:23-cv-02575-PA-AS

Assigned for all purposes to:
Judge Percy Anderson

**DECLARATION OF JOSEF
BERNSTEIN IN SUPPORT OF
MOTION FOR ORDER
APPROVING SETTLEMENT
UNDER CALIFORNIA LABOR
CODE SECTION 2699 ET SEQ**

Hearing Date:

Hearing Time:

Courtroom: 9A

Case filed: March 1, 2023
Trial date: TBD

**DECLARATION OF JOSEF BERNSTEIN IN SUPPORT OF MOTION FOR ORDER
APPROVING SETTLEMENT UNDER CALIFORNIA LABOR CODE SECTION 2699
ET SEQ**

1 I, Josef Bernstein, declare as follows:

2 1. I currently reside in California. I am over the age of eighteen and have
3 personal knowledge of everything stated below and could competently testify to
4 these facts if sworn.

5 2. I submit this Declaration in support of the motion for approval of Private
6 Attorney General Act claims and enhancement fee.

7 3. I worked for Defendants Payreel, Inc., Anheuser Busch, LLC, 160Over90,
8 and Endeavor Operating Company, LLC, ("Defendants"). I worked for Defendants
9 as an hourly worker. While working for Defendants I worked very hard and felt
10 that I was not being treated like a valued worker. After my employment ended with
11 Defendants, I determined that I would attempt to effectuate a change in
12 Defendants' practices and policies through a representative action under the
13 Private Attorney General Act. After consulting with a law firm, I decided to file a
14 representative action claim against Defendants. I would consider myself a lower
15 wage hourly worker but despite this I still decided to take the risk of filing this
16 representative action and risk losing this case that could have exposed myself and
17 my family to certain attorneys' fees and costs incurred by Defendants. However,
18 my passion to vindicate the rights of my coworkers outweighed the risk exposure
19 to myself and my family as I believed that my co-workers deserved to be treated
20 fairly in the eyes of the law.
21

22 4. Throughout this case, I was required to answering questions during several
23 interviews by my attorney and the staff either in person or via telephone related to
24 the case, and locating and submitting documents to my attorney in support of the
25 claims.
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27 5. Throughout this litigation, I made myself available for a full-day mediation.
28 This mediation ended with a mediator's proposal. During the mediation, I

1 remained involved and provided information and details about Defendants'
2 practices and policies in support of the representative action claims so that the
3 claims could be maximized for the aggrieved employees. I also made myself
4 available to complete the settlement agreement and finalize the terms of the
5 settlement agreement and execute the settlement agreement.

6 6. In this litigation, I was committed throughout the entire process to ensure
7 that the private attorney general act members were treated fairly. I would estimate
8 that I devoted approximately 40 hours to the prosecution and resolution of these
9 claims.
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11 I declare under the penalty of perjury under the laws of the State of
12 California that the foregoing is true and correct. Executed on October 14, 2024 in
13 California.
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17 Josef Bernstein, Declarant
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