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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF SAN BERNARDINO**

11 NANCY MARQUEZ MALDONADO
12 A.K.A. NANCY MALDONADO MARQUEZ,
an individual, on behalf of herself all others
13 similarly situated,

14 PLAINTIFF,

15 vs.

16 BALDA C. BREWER, INC., and DOES 1
17 thru 50, inclusive,

18 Defendants.
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Case No.: CIVSB2219827

[Case Assigned for All Purposes to Hon. Kevin
C. Lee in Dept. S26]

**DECLARATION OF BRETT GREIVING IN
SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

DATE: May 29, 2026

TIME: 8:30 A.M.

DEPT: S26

FAC Filed: December 20, 2022

DECLARATION OF BRETT GREVING

I, BRETT GREVING, declare and state as follows:

1. I am an attorney duly licensed to practice law before all the courts of the State of California. I am a Member at the law firm of Cozen O'Connor, attorneys for Defendant Balda C. Brewer, Inc. ("Defendant") in the above-entitled action. I have personal knowledge of the facts stated herein and if called as a witness, I could and would competently testify thereto under oath.

2. I make this Declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement.

3. The Class Action Settlement that the Parties have arrived at and are seeking preliminary court approval for would apply to a Settlement Class of regular non-exempt employees of Defendant employed during the statutory period, and would also include contingent workers such as the Plaintiff who were engaged by Defendant and employed by staffing agencies.

4. According to Defendant's records which were derived from the staffing agency invoices, contingent workers who would be part of the Settlement Class were engaged and employed through the following staffing agencies: Affluent Staffing, LLC, C. Brew Co., C-Hiree Personnel Inc., Distinctive Personnel, Employee Leasing of Greater New York, Fairway Staffing Services, Inc., Leading Staffing Solutions, LSQ Funding Group, L.C., Nexem Partners, Personnel One, Quality Staffing Services, Inc., ResourceMFG, Select Staffing and Staff Holdings Inc.

5. At the time of the settlement agreement in principle, Defendant was not in possession of the contact or tax information of these Settlement Class Members who were employed through staffing agencies.

6. Defendant had the understanding that the non-party staffing companies who employed these Settlement Class Members would be in possession of their contact/tax information. Defendant made efforts to informally request and receive this information from the staffing agencies.

1 7. After these efforts were not successful, on or around January 16, 2025, and
2 May 12, 2025, Defendant, through counsel, issued deposition business records subpoenas
3 to ten staffing agencies, seeking necessary information for temporary, non-exempt workers
4 who worked at Defendant during the statutory period.

5 8. All staffing companies except for Affluent Staffing complied with Defendant's
6 subpoenas and based on my understanding, they have provided the information requested,
7 either directly to counsel's office or to Phoenix Class Action Administration Solutions
8 ("Phoenix"), the class action administrator the Parties agreed would be used for the
9 settlement.

10 9. Affluent Staffing did not comply with Defendant's subpoena, which was issued
11 on January 16, 2025.

12 10. Defendant's records show that there are approximately 245 employees of
13 Affluent Staffing who worked at Defendant and may be part of the settling class. Affluent
14 Staffing did not respond to my efforts to contact it and obtain their compliance about the
15 subpoena directly. We then researched public records and contacted attorneys who
16 represented Affluent Staffing in other cases. These efforts were not successful. On August
17 15, 2025, Defendant filed and served a Motion to Compel Affluent Staffing to comply with its
18 subpoena. The Motion to Compel was heard on January 7, 2026, and it was granted. Affluent
19 Staffing did not appear at the hearing on the Motion to Compel. Defendant served Affluent
20 Staffing with the Court order on the Motion to Compel, but as of the date of filing, Affluent
21 Staffing has not responded to Defendant or complied. Defendant now intends to file a Motion
22 for Sanctions and/or Contempt against Affluent Staffing.

23 11. I met and conferred extensively with Plaintiff's counsel and Phoenix and
24 propose that, in addition to mailed notices, additional class notice be published in the La
25 Opinion newspaper and Facebook, specifically targeting demographics of which Defendant
26 believes the most Settlement Class Members reside and will most likely see it.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct. Executed this 19th day of March, 2026 at San Francisco,
3 California.

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6 Brett Greving
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(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On April 22, 2026, I served all interested parties in this action the following documents described as: **DECLARATION OF BRETT GREVING IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

COZEN O'CONNOR

Walter M. Stella

wstella@cozen.com

Brett Greving

bgreving@cozen.com

388 Market Street, Suite 1000

San Francisco, CA 94111

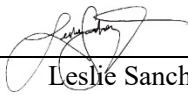
Attorneys for Defendant

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/432>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION) I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the below email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 22, 2026, at Chino, California.



Leslie Sanchez