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Attorneys for Plaintiffs
DANA BECERRA and SABRINA NORSWORTHY

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

DANA BECERRA and SABRINA
NORSWORTHY, individuals, on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

HUNGRY MARKETPLACE, INC., a
Delaware corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 22STCV37436

CLASS ACTION

*[Assigned for all purposes to the Hon.
William F. Highberger, Dept. SSC-10]*

**DECLARATION OF GARY BROTMAN
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: April 30, 2026
Time: 10:00 a.m.
Dept.: SSC-10

Action Filed: November 30, 2022
Trial Date: None Set

1 I, Gary Brotman, declare as follows:

2 1. I am an attorney at Marquee Law Group, A Professional Corporation, attorneys of
3 record (along with our co-counsel) for Plaintiffs Dana Becerra and Sabrina Norsworthy
4 (“Plaintiffs”) and the proposed Settlement Class in the above-captioned matter. I am a member in
5 good standing of the bar of the State of California and am admitted to practice in this Court. I
6 have personal knowledge of the facts stated in this declaration and could testify competently to
7 them if called upon to do so.

8 2. I graduated from the Drexel University Thomas R. Kline School of Law in 2011.
9 I became admitted to the California Bar the following year in 2012. I have been an attorney at
10 Marquee Law Group, A.P.C. since in or about the beginning of 2015. Our law firm is and has
11 always been located in Beverly Hills, California. I have practiced employment litigation during
12 the entirety of my current tenure at Marquee Law Group, representing Plaintiff’s in a multitude
13 of discrimination, retaliation, wrongful termination, wage and hour, and PAGA representative
14 actions. For the last nine (9) years, I have been the managing attorney for the firm’s entire
15 employment litigation department. During this time, I have played a large role in expanding the
16 litigation department to over 250 active cases.

17 3. Although non-exhaustive, the types of work I perform includes: conducting client
18 intakes; performing pre-filing research and analysis; drafting complaints; attending court
19 hearings; corresponding with opposing counsel; drafting and responding to written discovery;
20 taking and defending depositions; analyzing payroll and timekeeping records and employee
21 handbooks; drafting and opposing a variety of motions including motions for summary judgment,
22 motions for remand, demurrers and motions to dismiss, motions to compel, motions to quash;
23 drafting mediation briefs and attending mediations; drafting long-form settlement agreements;
24 drafting motions for preliminary and final PAGA settlement approval; and overseeing the claims
25 and/or opt-out processes. I also drafted appellate briefs for the California Court of Appeal and
26 argued before California State and Federal District Courts, all in connection with employment
27 matters.

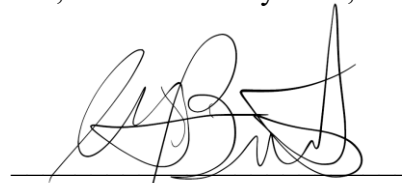
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1 4. I have handled a number of class and PAGA actions over my career. Of particular
2 relevance to this matter, I obtained approval of a PAGA settlement in the matter of *Alexander*
3 *Tellez, et al. v. Pery Consulting Group, LLC et al.*, Case No. 22VECV00088, Los Angeles County
4 Superior Court, Hon. Huey Cotton presiding, a PAGA action brought on behalf of financial
5 consultants involving claims for misclassification, failure to provide meal and rest periods, failure
6 to pay overtime, and other claims. I am currently involved with a number of wage and hour class
7 actions and PAGA matters currently pending with my firm.

8 5. In 2018, 2019, 2020, 2021, 2022, 2023, 2024, and 2025, Thomson Reuters
9 recognized me as a “Rising Star” in Southern California in the area of employment law in the
10 annual Super Lawyers magazine. This is an honor awarded to no more than two-and-a-half
11 percent (2.5%) of attorneys under the age of forty in Southern California each year.

12 6. I was heavily involved in the litigation of the *Norsworthy* matter since its inception
13 in 2022. I was also directly involved in the negotiations over the Settlement Agreement. I believe
14 the Settlement Agreement to be a fair, adequate, and reasonable resolution of the wage claims
15 brought by Plaintiffs in this matter. The work performed by myself and other members of my firm
16 is described in the Declaration of my colleague, Tuvia Korobkin, submitted concurrently
17 herewith.

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19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct. Executed on December 22, 2025 at Beverly Hills, California.

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Gary Brotman