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9 Grandpa Allen's Family Restaurant, Inc.

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

CLAIRE M. KRUPSAW, individually and as
representative of the State of California on
behalf of herself and all aggrieved employees,

Plaintiff,

v.

GRANDPA ALLEN'S FAMILY
RESTAURANT, INC. d/b/a Mama Kat's
Restaurant, a California corporation, and DOES
1 - 20, inclusive,

Defendants.

Case No. 25CU038615C

**DECLARATION OF GARY M. GITLIN,
ESQ., IN SUPPORT OF JOINT MOTION
FOR AN ORDER APPROVING THE
SETTLEMENT OF PLAINTIFF'S
INDIVIDUAL PAGA CLAIMS,
DISMISSING PLAINTIFF'S
INDIVIDUAL PAGA CLAIMS WITH
PREJUDICE, AND DISMISSING
PLAINTIFF'S NON-INDIVIDUAL PAGA
CLAIMS WITHOUT PREJUDICE**

Reservation Number: 100410

Hearing Date: May 22, 2026
Hearing Time: 8:30 a.m.
Hearing Location: Department C-74
Complaint Filed: July 22, 2025

I, Gary M. Gitlin, Esq., declare:

1. I am a member in good standing of the State Bar of California (California Bar No. 70965). I am co-counsel for the Defendant, Grandpa Allen's Family Restaurant, Inc. d/b/a Mama Kat's Restaurant, in the above-captioned action filed by the Plaintiff, Claire M. Krupsaw, currently pending in the Superior Court of the State of California, County of San Diego, Case No. 25CU038615C ("the Action").

1 2. I respectfully submit this declaration in support of the parties' Joint Motion for an
2 Order approving the settlement of Plaintiff's individual PAGA Claims, dismissing Plaintiff's
3 individual PAGA claims with prejudice, and dismissing Plaintiff's non-individual PAGA claims
4 without Prejudice ("the parties' Joint Motion").

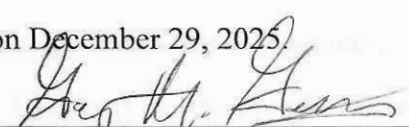
5 3. Defendant is a small, family-owned and operated restaurant with a well-established
6 reputation for serving the San Marcos community.

7 4. For settlement purposes only, Defendant does not oppose the damages model set
8 forth in the Declaration of Daniel V. Santiago in support of the parties' Joint Motion.

9 5. For settlement purposes only, Defendant does not oppose Plaintiff's counsel's
10 evaluation of a fair and reasonable settlement of Plaintiff's individual PAGA claims set forth in the
11 Declaration of Daniel V. Santiago in support of the parties' Joint Motion.

12 6. As pointed out in the Memorandum of Points and Authorities in support of the
13 parties' Joint Motion, Defendant denies any liability or wrongdoing in the Action. Nonetheless, in
14 connection with the defense of the claims at issue in the Action, Defendant's counsel have reviewed
15 with Defendant the Defendant's policies, procedures, and practices underlying the claims at issue in
16 the Action with an eye towards ensuring that, going forward, they are in full compliance with
17 California's wage and hour requirements set forth in the California Labor Code and the Industrial
18 Welfare Commission Wage Order No. 5-2001. Those policies, procedures, and practices relate to
19 Defendant's meal periods provided to its employees, its rest periods provided to its employees, its
20 payment of all wages due and owing to its employees, its timely payment of all wages due and
21 owing upon termination of its employees' employment, its itemized wage statements issued to its
22 employees, and its payment of tips to its employees.

23 I declare under penalty of perjury under the laws of California that the foregoing is true and
24 correct, and that this declaration was executed on December 29, 2025.

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27 Gary M. Gitlin, Esq.

28 Attorney for Defendant, Grandpa Allen's Family
Restaurant, Inc. d/b/a Mama Kat's Restaurant