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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

MARIAO WEBSTER, on behalf of the State
of California, as a private attorney general,

Plaintiffs,

vs.

CALIFORNIA SPAGHETTI
RESTAURANTS, INC., a California
Corporation; OSF INTERNATIONAL,
INC., a Corporation, and DOES 1
through 50, inclusive,
Defendants.

CASE NO.: **34-2023-00336879**

**DECLARATION OF CHANDLER C.
ROTH**

Hearing Date: April 17, 2026
Hearing Time: 8:30 a.m.

Judge: Hon. Jill H. Talley
Dept.: 23

Date Action Filed: March 20, 2023
Trial Date: Not set

Reservation # A-336879-001

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1 I, CHANDLER C. ROTH, declare as follows:

2 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
3 California, a senior trial attorney at Gomez Trial Attorneys, and one of the attorneys of record for
4 Mario Webster, on behalf of the State of California as private attorney general, in the above-
5 entitled representative action. I have personal knowledge of the facts set forth below, and if called
6 to testify, I could and would do so competently.

7 2. I submit this Declaration in support of Plaintiffs' PAGA Settlement (the "Motion to
8 Approve PAGA Settlement"), which is filed concurrently herewith.

9 **The Settlement Is Fair, Reasonable, And Adequate, It Should Be Granted**

10 **Preliminary Approval**

11 3. I am not aware of any conflicts of interest between my firm, its attorneys, my co-
12 counsel's firms and attorneys, and Plaintiffs or any other Aggrieved Employee.

13 4. As outlined in the accompanying declarations and supporting documents submitted
14 concurrently, the Gross PAGA Settlement Agreement represents a fair, reasonable, and adequate
15 resolution of the claims in this case. I fully support this Settlement, as it serves the best interests of
16 Plaintiff, the State of California and Aggrieved Employees.

17 5. To ensure that the State of California and the Aggrieved Employees received the
18 strongest and most effective representation possible, my firm strategically partnered with
19 Blumenthal Nordrehaug Bhowmik De Blouw LLP, respected colleagues with whom we have
20 successfully collaborated on numerous cases. Their experience in class action and PAGA litigation
21 brought invaluable expertise to this case, further strengthening our ability to advocate for the
22 Class. Their extensive background in wage and hour litigation, combined with their deep
23 understanding of the complexities involved in prosecuting large-scale class and representative
24 actions, played a critical role in advancing this case toward a successful resolution.

25 6. Given our extensive experience handling wage and hour class and representative
26 actions, my co-counsel and I are well-qualified to assess the strength of the class and
27 representative claims and the viability of Defendants' defenses. In our judgment, this Settlement
28 achieves a fair, reasonable, and adequate outcome.

1 **Plaintiffs' Counsel Is Experienced in Employment & Wage and Hour Litigation**

2 7. I earned my Bachelor of Arts from the University of Colorado, Boulder, in 2017
3 and my Juris Doctor from the University of San Diego, School of Law in 2020.

4 8. I am the Director of Employment Litigation at Gomez Trial Attorneys, a
5 distinguished and diversified law firm that was established in 2005. My firm has consistently
6 delivered outstanding results for Plaintiffs across a wide range of legal matters, including
7 Employment, Personal Injury, Class and Representative Actions.

8 9. As seasoned litigators, my team has handled numerous employment matters,
9 representing employees in wage and hour disputes, wrongful termination cases, harassment,
10 retaliation, and discrimination claims, and various other employment-related matters both in state
11 and federal courts.

12 10. Since being admitted to the bar, I have handled a broad spectrum of cases. I have
13 gained extensive experience litigating employment matters, personal injury cases, and class
14 actions. I have worked on behalf of both Plaintiffs and Defendants, advising on legal compliance
15 and assisting in the resolution of various workplace disputes.

16 11. I have had class and representative action litigation experience, mostly in the area
17 of employment class and representative actions. I have experience in cases involving labor code
18 violations and wage and hour claims. I have litigated similar wage and hour cases against other
19 employers on behalf of employees. My firm has been approved as class and representative counsel
20 in California courts previously. It is this level of experience that enabled my firm to undertake the
21 instant matter.

22 12. Based on the history of this case and given our firm's extensive experience as class
23 and representative action employment and wage and hour litigators, it is my view that the
24 settlement is fair, reasonable, and adequate, and in the best interest of the State of California and
25 the Aggrieved Employees.

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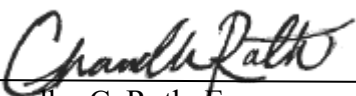
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13. I have no conflicts of interest with the Aggrieved Employees.

14. I have not previously represented Defendants in any matter.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 23rd day of January 2026, at San Diego, California.


Chandler C. Roth, Esq.