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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN FRANCISCO

AHMONE BRYANT; SUSAN RODGERS; VERONICA SALDANA; AMANDA HALE; and JESUS GOMEZ, individually and on behalf of all others similarly situated,

Plaintiffs,

vs.

BRINKER RESTAURANT CORPORATION; BRINKER INTERNATIONAL, INC.; and BRINKER INTERNATIONAL PAYROLL COMPANY, L.P.,

Defendants.

Case No.: CGC-23-608589
(Consolidated with CGC-21-597124)

[*Case assigned for all purposes to the Hon. Jeffrey S. Ross; Dept. 613*]

DECLARATION OF PLAINTIFF AMANDA HALE IN SUPPORT OF PLAINTIFFS' RENEWED MOTION FOR APPROVAL OF SETTLEMENT OF CLAIMS BROUGHT UNDER THE PRIVATE ATTORNEYS GENERAL ACT OF 2004, ATTORNEYS' FEES AND COSTS, REPRESENTATIVE ENHANCEMENT PAYMENTS, AND ADMINISTRATION EXPENSES

Date: May 8, 2026
Time: 11:00 a.m.
Dept: 613

Action Filed: August 16, 2023
Trial Date: None Set

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DECLARATION OF AMANDA HALE

I, Amanda Hale, declare as follows:

1. I am over the age of 18 and one of the named Plaintiffs in this action. I submit this declaration in support of Plaintiffs' Renewed Motion for Approval of Settlement of claims brought under the Private Attorneys General Act of 2004 ("PAGA"), attorneys' fees and costs, representative enhancement payments, and administration expenses. I have personal knowledge of the facts stated in this declaration. If called as a witness, I could and would testify competently to them.

2. I worked for Defendants Brinker Restaurant Corporation, Brinker International, Inc., and Brinker International Payroll Company, L.P. as a non-exempt front of house server at a Chili's restaurant in Simi Valley, California, from approximately December 2005 through approximately March 2020.

3. During the later part of my employment, I primarily worked closing shifts at the Simi Valley Chili's. Earlier in my employment, servers were sent on 30-minute meal periods by "breakers," but that practice later stopped. By the later part of my employment, meal periods were rare, I do not recall being provided separate rest periods, and I often worked through my meal periods while continuing to take care of my tables. I also used HotSchedules and my personal cell phone for work-related purposes, including checking schedules and communicating about shifts. Based on those experiences, I believed Defendants were violating California law with respect to meal periods, rest periods, unpaid work, and the use of my personal cell phone for work-related business purposes. Because of those concerns, I submitted a PAGA notice to the Labor and Workforce Development Agency on September 8, 2021, and later amended that notice on January 17, 2023.

4. I agreed to serve as a representative plaintiff because I wanted to help address Defendants' practices, assist other aggrieved employees, and help enforce California labor laws. I understood that doing so would require time and effort beyond that of other employees. No one guaranteed me any personal recovery in exchange for serving as a representative plaintiff.

5. I believe I adequately represented the interests of the State of California and other

aggrieved employees in connection with the PAGA claims resolved by the settlement. I stayed in contact with my attorneys, provided truthful information and relevant documents, reviewed important materials, and remained available to assist throughout the case. I do not know of any conflict that prevented me from fairly representing other aggrieved employees with respect to the PAGA claims at issue.

6. I assisted with this matter by communicating with counsel about the facts of my employment and Defendants' practices, providing documents and information, reviewing case materials, participating in the settlement process, and reviewing the settlement agreement. I also prepared for and sat for a full-day deposition, which required additional time reviewing the facts, documents, and issues in the case with counsel.

7. I estimate that I spent approximately 25 hours total on this matter. That time included phone calls and meetings with counsel, reviewing documents and pleadings, searching for and providing documents and information, preparing for and sitting for deposition, reviewing the settlement agreement, and participating in the settlement process.

8. Serving as a representative plaintiff took time and involved risk. My name appeared in public court filings, and I understood that I could be required to provide documents, answer written questions, sit for deposition, and stay involved in the case for a long time, with no guarantee of recovery. My involvement began in 2021, when I started the PAGA process, and continued through the current settlement proceedings. During that time, I remained available to help counsel and carry out my responsibilities as a representative plaintiff.

9. The requested representative enhancement payment for me is $2,500. I understand that this amount is subject to Court approval and is not guaranteed. In my view, that amount is fair and reasonable in light of the time and effort I devoted to the case, the burdens and risks I assumed, and the length of my involvement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on Apr 9, 2026, at Simi Valley, California.



Amanda Hale