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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN FRANCISCO

AHMONE BRYANT and SUSAN RODGERS, individually and on behalf of all others similarly situated, Plaintiffs, v. BRINKER RESTAURANT CORPORTATION; BRINKER INTERNATIONAL, INC. and BRINKER INTERNATIONAL PAYROLL COMPANY, L.P., inclusive, Defendants.	Case No: CGC-23-608589 (lead case) Consolidated with Case No.: CGC-21-597124 **DECLARATION OF VERONICA SALDANA** Date: -----, 2026 Time: 11:00 a.m. Location: Room 613 Judge: Jeffrey S. Ross

Lawyaw Package ID: 6574bf14-5a1d-431a-821c-d6375397a232

DECLARATION OF VERONICA SALDANA

I, VERONICA SALDANA, 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. Except for those matters stated on information and belief, of which I am informed and believe are true and correct, I have personal knowledge of all matters set forth herein. If called as a witness, I could and would competently testify thereto.

3. I understand that I brought this case as a class action and Private Attorneys General Act (PAGA) representative action, as a result, assumed a fiduciary responsibility to prosecute the action on behalf of absent parties and to the State of California to prosecute this action for civil penalties under the Labor Code.

4. I understand that, as an aggrieved employee bringing a representative action under PAGA, I am responsible for trying the case, appearing in court and working with my attorneys, the Ottinger Firm, P.C., on behalf of absent aggrieved employees.

5. I understand that the settlement in this case is for the claims under PAGA only, and that my class action claims will be dismissed.

6. Defendants own and operate a national chain of restaurants across the United States under the name Chili's Grill & Bar. The company has multiple properties in California. While employed by Defendants I worked alongside the other aggrieved employees and was subjected to the same policies and practices as Defendants' other employees during the PAGA period. I worked for Defendants for over two years and was able to observe these workplace violations. As such, I am able to represent the absent aggrieved employees.

7. Throughout my employment, I personally experienced numerous workplace violations. Like other members of the putative class, I frequently missed breaks. I was never able to

take a full thirty-minute lunch break because Defendants never provided any coverage for my duties. I was also never able to take a ten-minute break, even on days when I worked over eight hours a day. Defendants compelled me to complete training sessions when I was not clocked in, even though these sessions were mandatory. My understanding is that the Defendants compelled all employees to do this. Defendants also compelled me to complete mandatory tasks when I had already clocked out. Like other aggrieved employees, I was not properly compensated for using my personal cell phone for work-related reasons, specifically a scheduling application.

8. I have fulfilled my duties to the State of California and other aggrieved employees by retaining experienced counsel, providing information and documents, assisting them in identifying claims and evaluating the case, and waiting an extended period for payment so that they could pursue a resolution for all aggrieved employees. If I had been called upon, I would have made myself available for a deposition and/or to testify at trial.

9. In total, I estimate that I spent between fifteen and twenty hours working with my attorneys to pursue this case. That time included telephone calls and meetings with counsel, providing factual background about my employment and Defendants' practices, searching for and providing documents and information, reviewing pleadings and case materials, remaining available during the mediation and negotiation of the settlement, reviewing the settlement documents, and providing this declaration.

10. I am informed of the status of the arbitration relating to my individual claims. On or about August 10, 2023, the Court ordered my individual PAGA claim to arbitration and stayed my court case. My attorneys filed a Demand for Arbitration and Statement of Claims with the American Arbitration Association on my behalf on September 14, 2023, and a hearing in that arbitration was later scheduled for December 2024. The parties reached a settlement at mediation on November 7, 2024, before that hearing took place. I understand that the claims I asserted in that arbitration are being resolved through this settlement.

11. Serving as a representative plaintiff involved time, effort, and risk. My name appeared in public court filings, and I understood that I could be required to provide documents, answer written questions, sit for a deposition, and remain involved in the case for a long time, with

no guarantee of any recovery. I also understood that I could be responsible for costs in this case if we did not prevail. My involvement began in 2021 and has continued through these settlement proceedings, a period of more than five years. Other than the enhancement payment I am requesting, my share of the settlement, and the separate amount I am to receive in consideration for the release of my individual claims, I have received no personal benefit from this case.

12. The representative enhancement payment requested 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.

13. I believe that the proposed PAGA settlement is fair, reasonable, and adequate to the State of California and the aggrieved employees. Although I believe we have strong claims, I understand that continued litigation would involve significant risks, including the possibility of recovering nothing. I also understand that appeals and further litigation could delay any recovery for years.

14. In my judgment, the settlement provides meaningful relief. It ensures that the State of California receives its statutory share of civil penalties, while also distributing monetary recovery directly to aggrieved employees who experienced the violations. I believe this compromise appropriately balances the risks and uncertainties of further litigation against the benefits of providing immediate, certain relief to the affected workers and the State.

15. I have reviewed the settlement with my counsel, discussed its terms, and understand the allocation. Based on my personal knowledge of the workplace practices at issue and my involvement in this case, I believe that the settlement represents a fair and adequate resolution in the best interests of the State of California and the aggrieved employees.

I declare under the penalty of perjury of the laws of the State of California that the foregoing is true and correct.

Executed on 10/15/2026, at Riverbank, California.

VERONICA SALDANA

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Declarant