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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 JESUS GOMEZ 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 JESUS GOMEZ

I, Jesus Gomez, 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 back of house cook at a Chili's restaurant in Carson, California, from approximately February 2005 through approximately February 2023.

3. During the later part of my employment, I worked as a cook and lead cook at the Carson Chili's and regularly worked long shifts, including nights and weekends. Defendants did not provide enough staff to relieve cooks for meal periods or rest periods. As a result, meal periods were rare, rest periods were missed, and I often ate while standing at the food line or continued working while trying to eat. I also sometimes started work before clocking in so I could open the food line in time. In addition, Defendants required me to use HotSchedules and my personal cell phone to check schedules, request time off or shift changes, and communicate about work. 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 January 9, 2023.

4. I agreed to serve as a representative plaintiff because I believed Defendants' practices were not fair, I wanted to help address those practices, and I did not want other employees to continue going through the same thing. 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 the Brinker litigation by communicating with counsel about my work as a cook, including staffing in the kitchen, missed meal periods and rest periods, pre-shift work, HotSchedules, and the use of my personal cell phone for work. I provided documents and information, reviewed case materials, participated in the settlement process, and reviewed the settlement agreement. I also prepared for and sat for a full-day deposition, which required additional time reviewing the facts, documents, and issues with counsel. In the related Hale litigation, I also had to address issues relating to my prior bankruptcy. That required additional time working with counsel and bankruptcy counsel to reopen the bankruptcy case, review and sign amended schedules and other related papers, and resolve those issues.

7. I estimate that I spent approximately 35 hours total on these matters. 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, communicating with counsel about reopening my bankruptcy case, reviewing and signing bankruptcy-related papers, 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, address issues relating to my prior bankruptcy, and stay involved in the case for a long time, with no guarantee of recovery. My involvement began in 2023, when I submitted my PAGA notice, 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 7, 2026, at Gardena, California.

Jesus Gomez
Jesus Gomez (Apr 7, 2026 16:20:32 PDT)

Jesus Gomez