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7 Attorneys for Plaintiff CHRISTOPHER PUGA
8 on behalf of the State of California,
and others similarly situated and aggrieved

9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF SANTA CLARA**

12 CHRISTOPHER PUGA, on behalf of the
State of California, and others similarly
situated and aggrieved,

13 Plaintiff,

14
15 v.

16 BIG 5 CORP., a Delaware Corporation;
BIG 5 SPORTING GOODS
17 CORPORATION, a Delaware corporation;
and DOES 1-100, inclusive,

18
19 Defendants.

Case No.: 23CV412953

**DECLARATION OF CHRISTOPHER PUGA
IN SUPPORT OF MOTION FOR COURT
APPROVAL OF THE PARTIES' PAGA
SETTLEMENT**

Date: July 18, 2024

Time: 1:30 p.m.

Place: Department 7

1 **DECLARATION OF CHRISTOPHER PUGA**

2 I, Christopher Puga, declare and state as follows:

3 1. I was employed by Defendants Big 5 Corp. and Big 5 Sporting Goods Corporation
4 (“Defendants”) as an hourly paid, non-exempt human resources assistant/clerk in the Human
5 Resources Department located Defendants’ corporate offices in El Segundo, California from April
6 2021 to March 2022. I decided to file this lawsuit because I had a number of grievances against
7 Defendants stemming from their labor policies. These grievances are set forth in detail in the
8 operative Complaint and my letter to California Labor and Workforce Development Agency
9 (“LWDA”).

10 2. Prior to filing the action, my attorneys and I had multiple conferences about the
11 factual bases for the claims that I wanted to pursue against Defendants.¹ During those conferences,
12 my attorneys provided me with an overview of how those claims would be litigated and generally
13 educated me about the nature of complex/representative litigation and my role as the representative
14 Plaintiff.

15 3. After retaining my attorneys, I spent considerable time on the phone discussing the
16 facts of my case with my attorneys. I discussed the facts related to my employment with Defendants,
17 including discussing my job duties and responsibilities, my job position, the hours and days I
18 worked, and how I was compensated.

19 4. When I agreed to represent the LWDA as a deputized private attorney general, I
20 understood it was my duty to be readily available and to participate actively in this case. I knew that
21 I would be required to review documents, search for documents and produce them to my attorneys,
22 answer written questions, potentially answer oral questions and testify truthfully under oath, and be
23 available to appear in court, if necessary.

24 5. I understood that I needed to maintain awareness of the status and progress of the
25 lawsuit.

26 6. My attorneys provided me with a draft of the Complaint for my review and approval.
27 I closely reviewed the Complaint to ensure accuracy and completeness. Following the filing of the
28 Complaint, I collaborated with my attorneys on the prosecution of my claims, and I regularly

1 contacted my attorneys to stay current on the status of the litigation, and to discuss my attorneys'
2 progress in prosecuting the claims.

3 7. I have worked to the best of my ability to prosecute this action on behalf of the
4 LWDA, always considering the interests of the LWDA just as I would consider my own interests. I
5 believe PAGA actions are an important tool to assure compliance with the Labor Code.

6 8. Since initiating this lawsuit until now, I have kept aware of the status of the lawsuit
7 and provided my attorneys with information used by them in the litigation. I have spent large
8 amounts of time and effort pursuing my claims and the claims of the other employees from the time
9 I retained my attorneys to the present date.

10 9. I have carefully reviewed the terms of the proposed settlement. My attorneys
11 explained the specifics of how the settlement would work and I accepted the settlement only after I
12 had spent time evaluating the proposed outcome to assure that it was fair. Based on my attorneys'
13 evaluation and recommendation, and my own review, I believe the settlement is fair and reasonable
14 in light of PAGA's policies and purposes.

15 10. In summary, over the course of this litigation I have spent a significant amount of
16 time conferring and working with my attorneys on the prosecution of my claims and evaluating the
17 settlement and related documents. I estimate that I have spent between 25 and 35 hours assisting my
18 attorneys in the prosecution of this lawsuit.

19 11. Throughout this case, I have not sought individual benefits from the lawsuit. Rather,
20 I maintained this lawsuit because I wanted to hold Defendants accountable for their unlawful
21 conduct. I believe that I have fulfilled my responsibilities, and I will continue to fulfill those
22 responsibilities, to the best of my ability, until the conclusion of the case.

23 12. I am committed to this case and will continue to make myself available as needed in
24 the settlement process.

25 I declare under penalty of perjury of the laws of California and the United States that this
26 statement is true and correct. Executed this 25th day of June, 2024, at Los Angeles,
27 California.

Christopher Puga

CHRISTOPHER PUGA

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