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13 Attorneys for Plaintiff Keith Brooks

14 UNITED STATES DISTRICT COURT
15
16 CENTRAL DISTRICT OF CALIFORNIA

17 Keith Brooks, an individual, on behalf of
18 himself and all others similarly situated
19 and as a private attorney general pursuant
20 to the Private Attorneys General Act,

21 Plaintiff,

22 vs.

23 Burlington Coat Factory Warehouse
24 Corporation, Burlington Coat Factory of
25 Texas, Inc., and Does 1 through 10,

26 Defendants.

Case No. 5:24-CV-0041-SRM-SHK

**Declaration of Keith Brooks in
Support of Motion for Order
Approving PAGA Settlement**

Date: October 22, 2025

Time: 1:30 p.m.

Crtrm: 5D

**Declaration of Keith Brooks in Support of Motion for Order Approving PAGA
Settlement**

1 I, Keith Brooks, declare:

- 2 1. I am one of the named plaintiffs in this action. Except as otherwise stated, I have
3 personal knowledge of all matters set forth in this declaration.
- 4 2. I was hired by Center Staffing in or around January, 2022 and placed at
5 Defendants' warehouse located at 27582 E Pioneer Ave., Redlands, CA 92374.
6 I was terminated by Center Staffing in or around the end of November, 2022.
- 7 3. I have actively and diligently participated in the prosecution of this case. The
8 activities I have performed have included, but have not been limited to, obtaining
9 legal counsel, speaking with my legal counsel and members of their staff on
10 many occasions, assisting my counsel in gathering information, review
11 documents produced in discovery, discussing settlement with my counsel, and
12 making myself available on the day of the mediation. I have also spent time
13 reviewing the Settlement and other case related documents on my own and with
14 my counsel to make sure that the Settlement and other work my attorneys
15 performed are in the best interest of the State of California, and the group of
16 aggrieved PAGA employees. I believe I have been diligent in acting as a
17 representative for the State of California and the group of aggrieved PAGA
18 employees throughout all stages of this litigation. I estimate that I will have spent
19 around 60 hours of my time in connection with this case.
- 20 4. As I understand it, the Settlement requires me to sign as part of this Settlement
21 a general release which is more extensive than the releases that will be created
22 by Court order related to the other aggrieved PAGA employees. I also
23 understand that I have a claim for wrongful termination. Because of these, I
24 understand that the requested payment from this Settlement that is set forth
25 below is in part monetary consideration for me signing this more extensive
26 general release and waiving my wrongful termination claim.
- 27
28

- 1 5. My attorneys have advised me of the possibility that, if the case was lost, I
2 could have been ordered to pay Defendants' costs in this case, which I
3 understand could be significant. I believed in this case so much that I was
4 willing to be a named plaintiff and risk this personal exposure and pursue this
5 PAGA action litigation.
- 6 6. Because of this lawsuit, there is a public record at the Court showing that I was
7 a named Plaintiff in a PAGA action for unpaid wages against my former
8 employer. The payment to me is not equal to the harm that I could suffer to my
9 future career prospects that this case may cause me.
- 10 7. I understand that I will be receiving \$10,000 for me signing a more extensive
11 general release than other aggrieved PAGA employees. I understand that by
12 signing this declaration, I am giving up all of my personal claims against the
13 Defendants in this action -- which is a release in excess of what other aggrieved
14 employees are being required to do. As a result, I understand that the \$10,000
15 requested here is, among other things, compensation related to this release.
- 16 8. I am aware that my attorneys have fee-sharing agreements in this case. I
17 understand that any attorney's fees awarded will be divided among my attorneys
18 and I have agreed to that fee division.

19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct.
21

22 Dated: September 15, 2025

23
24 *Keith Brooks*

25 _____
Keith Brooks