

WORRELL LAW FIRM, APC

Kyle C. Worrell (SBN 281287)
kcw@worrell-law.com
1717 Old Tustin Avenue, Unit E
Santa Ana, CA 92705
Telephone: (657) 232-1450
Facsimile: (657) 232-1430

Attorneys for Plaintiff

ANDREA PUNGI, individually and on behalf of others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

RHAY TAYLOR in a Representative capacity
only, and on behalf of other members of the
general public similarly situated,

Plaintiff,

v.

ALTER MANAGEMENT LLC, a California
Limited Liability Company; ALTER
MENTAL HEAL TH LLC, a California
Limited Liability Company; ALTER
MENTAL HEALTH- DANA POINT, LLC,
a California Limited Liability Company;
ALTER WELLNESS CARE LLC, a
California Limited Liability Company;
ALTIGNIS CAMPUS LLC, a California
Limited Liability Company; ALTER
HEALTH GROUP, INC., a California
Corporation; CALIFORNIA REHAB
CAMPUS, LLC, an Arizona Limited
Liability Company; CAMBRIDGE MENTAL
HEALTH MANAGEMENT LLC dba
ALTER BEHAVIORAL HEALTH, a
California Limited Liability Company;
ALTIGNIS HEALTH, LLC, a California
Limited Liability Company; and DOES 1-10,
inclusive,

Defendants.

Case No. 37-2024-00007620-CU-OE-CTL

**DECLARATION OF KYLE C.
WORRELL IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT,
CONDITIONAL CERTIFICATION,
APPROVAL OF CLASS NOTICE, AND
SETTING OF FINAL APPROVAL
HEARING DATE**

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

27

28

1 Code she contends were violated and the theories supporting her contentions. After waiting the
2 requisite sixty-five (65) days for the Private Attorneys General Act of 2004 (“PAGA”) notice period
3 to expire, Plaintiff Pungi filed a PAGA Complaint on December 2, 2024, in the Superior Court of
4 California, County of Los Angeles. The PAGA Complaint was filed as a standalone PAGA-only
5 complaint with one cause of action for violation of Labor Code sections 2698, *et seq.* (PAGA) (the
6 “Pungi PAGA-Only Action”).

7 4. On October 17, 2024, Pungi separately filed a wrongful termination action in Orange
8 County Superior Court, Case No. 30-2024-01434028-CU-OE-CJC, to pursue her individual claims
9 for wrongful termination, discrimination, failure to engage, failure to accommodate, and related non-
10 wage employment claims (“Pungi’s Non-Wage Claims”).

11 5. In early 2025, I was contacted by counsel for Plaintiff Rhay Taylor and for the Alter
12 Defendants to discuss the possibility of reaching a global resolution on the *Taylor* and *Pungi* wage
13 and hour class action and PAGA claims. After meeting and conferring with all counsel, reviewing
14 the Memorandum of Understanding that had been reached at the *Taylor* mediation, and in personally
15 evaluating the terms of the Agreement, including a comparison and evaluation to my own
16 investigation and research into my client’s experience and the wage and hour violations allegedly
17 incurred while working for Defendants, I concluded that the settlement agreement that was reached
18 represented a fair, adequate, and reasonable settlement that is well within the accepted range of
19 recoveries for similar cases. I further believe the Agreement is in the best interests of the Settlement
20 Class Members, as defined in the Agreement, and that the Settlement Class Members would benefit
21 from proceeding with a global resolution rather than a protracted Settlement Approval proceeding. I
22 reach these conclusions based on my knowledge, training, and experience in class action, PAGA, and
23 individual wage and hour cases in California, as discussed more fully below.

24 **CLASS ACTION / PAGA / INDIVIDUAL WAGE AND HOUR EXPERIENCE OF**
25 **WORRELL LAW FIRM, APC & KYLE C. WORRELL, ESQ.**

26 6. I was admitted to the State Bar of California in 2011 and have practiced employment
27 law throughout my more than 13 years of practice. I spent the first 11 years of my practice at litigation
28 defense firms, including most recently at an AM Law 100 employment law firm, Jackson Lewis, P.C.

1 I formed Worrell Law Firm in April 2023, to focus on complex employment litigation, including
2 class action, representative action, multi-party, and single-plaintiff matters. Worrell Law Firm, APC,
3 handles California employment cases from inception through trial, arbitration, or settlement.
4 Although our focus is primarily on contingency-based employee claims against employers, our firm
5 still provides hourly rate work to select employers and high-level executive employees on a case-by-
6 case basis.

7 7. In its relatively short existence, Worrell Law Firm has already obtained awards for
8 deserving clients as prevailing parties in several arbitration hearings where I served as lead counsel,
9 and in a jury trial where I served as co-counsel. This year alone our firm has obtained substantial
10 individual wage and hour Final Awards as part of a mass arbitration against *Amazon Logistics, Inc.*,
11 including the following:

- 12 a. *L. Castillo v. Amazon Logistics, Inc.*, AAA No. 01-20-0007-4243 (Jul. 1, 2025), Final
13 Award of \$127,749.49, for individual claimant asserting wage and hour claims.
- 14 b. *K. Davis v. Amazon Logistics, Inc.*, AAA No. (Aug. 8, 2025), Final Award of
15 \$524,915.22, for individual claimant asserting individual wage and hour claims.
- 16 c. *H. Ferguson v. Amazon Logistics, Inc.*, AAA No. (Sept. 4, 2025), Final Award of
17 \$468,306.95, for individual claimant asserting individual wage and hour claims.
18 Notably, a sizable portion of this Final Award included \$27,700.00, that was
19 earmarked for individual PAGA penalties after a finding of willful misclassification
20 under Labor Code section 226.8.

21 8. In the past two years, we have also resolved a number of claims via settlement for
22 employees who suffered wage and hour violations or wrongful termination-type claims.

23 9. Prior to opening my own law firm in April 2023, I was a Principal Attorney at Jackson
24 Lewis, P.C., one of the nation's premier law firms devoted exclusively to representing employers in
25 all aspects of labor and employment law. With a network of over 1,100 attorneys across more than
26 60 offices nationwide, the firm has a reputation for excellence through its deep understanding of
27 workplace law, proactive compliance strategies, and aggressive litigation defense. I litigated
28 employment law cases at Jackson Lewis for nearly a decade (from 2014 to 2023), including my final

1 few years as a Principal (from 2021 to 2023). I was appointed to various leadership positions in the
2 Orange County office, including: Office Business Development Liaison (from 2021 to 2022),
3 Associate Chair (from 2019 to 2020), and Litigation Trainer/Coordinator (from 2015 to 2018). I was
4 also asked to speak at various event, including at the firm’s largest client-facing event, an end of year
5 seminar on upcoming changes to California employment law, where I was a panel speaker on the
6 topic of arbitration agreements and class action waivers. I was the author of multiple blog entries on
7 various topics on employment law (one of which was selected for publication in the Daily Journal
8 with co-author Jonathan Seigel).

9 10. During my tenure with Jackson Lewis, I had a busy litigation practice focused on
10 defending employers of all sizes—including several Fortune 100 companies—in all aspects of state
11 and federal employment law. This experience included litigating class action, representative action,
12 multi-party, and single plaintiff cases involving wage and hour issues and PAGA claims. I provided
13 advice and counsel on wage and hour compliance, investigations, counseling, discipline, and
14 termination decisions, among other things. In addition to litigating hundreds of single-plaintiff
15 discrimination or wage and hour cases, I was primary managing attorney on more than 30 class action
16 and/or PAGA representative action cases involving wage and hour issues, including responsibilities
17 for overall case strategy and management, exposure analyses, significant law and motion work,
18 organizing and conducting witness interviews/blitzes, mediation and settlement. My experience with
19 class action and PAGA cases includes data analysis, mediation preparation, settlement negotiations,
20 and working through the process of preliminary and final approval. I also had primary responsibility
21 for organizing and conducting various declaration “blitzes,” including a massive declaration blitz
22 where we helped our client obtain more than 600 witness declarations after conducting more than 900
23 witness interviews to help defend against a class action case involving approximately 2,000 non-
24 exempt employees.

25 11. In 2018, my colleague Scott C. Lacunza and I were recognized by the *Daily Journal*
26 as obtaining one of the Top Verdicts in Employment Law—Wage and Hour, as the result of defeating
27 class certification for an employer in a wage and hour class action case where the plaintiff had moved
28 for class certification based on alleged employee misclassification. When the plaintiff appealed, I

1 played a leading role in the employer’s defense in the Court of Appeal, including managing review
2 of the extensive appellate record (approximately 5,000 pages, half of which was counter-designated),
3 conducting in-depth legal research, and drafting the appellate briefing. The Court of Appeal
4 unanimously affirmed the trial court’s orders that we had obtained for our client—including (1) the
5 denial of class certification and (2) the protective order limiting class discovery—in a published
6 opinion: *Modaraei v. Action Property Management, Inc.* (2019) 40 Cal.App.5th 632.

7 12. Prior to working at Jackson Lewis, I was an associate attorney at Bonne, Bridges,
8 Mueller, O’Keefe & Nichols (“Bonne Bridges”), a litigation firm in California that primarily focuses
9 on insurance defense, including employment practices liability insurance. My experience at Bonne
10 Bridges included working on several trial and appellate teams that prevailed at jury and bench trials
11 and then successfully defended those verdicts on appeal.

12 13. I received a J.D. with honors from the Chapman University’s Dale E. Fowler School
13 of Law (formerly, “Chapman University School of Law”) in 2011, graduating in the top 10% of my
14 class. I was the Editor-in-Chief of *Nexus: Chapman’s Journal of Law and Policy* in 2011, an Editor
15 of the *Nexus* journal in 2010, and was one of five students in the graduating class to receive the
16 National Order of Scribes Nomination for excellence in legal writing. I was also selected to be an
17 Academic Fellow to tutor law students for core 1L classes: Civil Procedure I and II and Legal
18 Research and Writing. I was later hired by the law school to serve as an Adjunct Professor of Law
19 teaching a Civil Procedure Lab course to 1Ls, a role that I served for two academic years from 2016
20 to 2017.

21 14. I received a B.A. double major in Mathematics and Political Science, with a minor in
22 Political Philosophy, and graduated with Student Leadership Honors, from the University of Alaska
23 Anchorage in 2008. The background in Mathematics, in particular, has been beneficial in navigating
24 the challenging data and equation-based aspects of California wage and hour law.

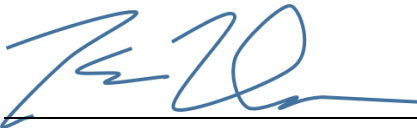
25 15. Worrell Law Firm is also staffed with seasoned paralegals with decades of experience
26 in California employment law and wage and hour class action and PAGA cases.

27 16. As noted above, it is my conclusion that the Settlement Agreement reached is a fair,
28 adequate, and reasonable settlement that is well within the accepted range of recoveries for similar

1 cases. I further believe the Agreement is in the best interests of the Settlement Class Members, as
2 defined in the Agreement, and that the Settlement Class Members would benefit from proceeding
3 with a global resolution rather than a protracted Settlement Approval proceeding.

4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and correct to the best of my personal knowledge.

6
7 Executed on September 18, 2025, in Santa Ana, California.

8
9 

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Kyle C. Worrell