

Arrash T. Fattahi (SBN 333676)
arrash.fattahi@wilshirelawfirm.com
Arman A. Salehi (SBN 351112)
arman.salehi@wilshirelawfirm.com
Emily Borman (SBN 303180)
emily.borman@wilshirelawfirm.com
Courtney M. Miller (SBN 327850)
courtney.miller@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
660 S. Figueroa Street, Sky Lobby
Los Angeles, California 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA

BRANDI SANFORD, individually, and on
behalf of all others similarly situated,

Plaintiff,

v.

PACIFIC STATES PETROLEUM, INC., a
California corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: C23-03200

*[Assigned for All Purposes to the Hon.
Edward Weil, Dept. 39]*

**DECLARATION OF BRANDI SANFORD
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Action Filed: December 18, 2023

DECLARATION OF BRANDI SANFORD

I, Brandi Sanford, declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath. I make this declaration in support of my Motion for Preliminary Approval of Class Action and PAGA Settlement.

2. I worked for Defendant Pacific States Petroleum, Inc. ("Pacific States Petroleum") from approximately September 2022 to approximately August 2023. I worked for Pacific States Petroleum as a dispatch administrator.

3. Based on my experience and knowledge of Pacific States Petroleum's wage-and-hour policies and my familiarity with their employment practices, I worked with my attorneys to bring claims on behalf of myself and other hourly-paid non-exempt employees of Pacific States Petroleum.

4. I am seeking to become a class representative in this case. I believe my experiences are similar to those of other hourly-paid non-exempt employees of Pacific States Petroleum based on my experience working for Pacific States Petroleum for nearly one (1) year. I believe we were all subject to the same employment policies and practices.

5. I do not have any conflicts with other hourly-paid non-exempt employees that would interfere with my ability to represent them. I believe I will adequately represent the other hourly-paid non-exempt employees at Pacific States Petroleum.

6. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by Pacific States Petroleum's company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by Pacific States Petroleum.

7. I have always kept the best interests of the other hourly-paid non-exempt employees in mind while performing my duties as a named plaintiff in this case. I have been committed throughout the course of this case to prosecuting this case on behalf of myself and the other

employees. I believe that I have demonstrated my ability to advocate for the interests of the other hourly-paid non-exempt employees by initiating this lawsuit, providing information to my attorneys, keeping in contact with my attorneys regarding the status of the case, meeting with my attorneys in advance of mediation, and reviewing the settlement agreement to make sure it was fair.

8. I will continue to actively participate in this lawsuit as necessary and will continue to make myself available to assist in this case moving forward as needed.

9. I do not have any actual or potential conflicts of interest with Class Members or the proposed Settlement Administrator, Apex Class Action LLC.

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

Executed on 11/14/2025, at Oakland, California.

Signed by:

Brandi Sanford

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Brandi Sanford