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Attorneys for Plaintiff Connor Brown and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO**

CONNOR BROWN, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the
California Private Attorneys General Act,

Plaintiff,

vs.

BI-RITE MANAGEMENT SERVICES LLC,
a California limited liability company; BI-
RITE MARKET, INC. dba BI-RITE
FAMILY OF BUSINESSES, a California
corporation; BI-RITE CREAMERY, INC., a
California corporation; BIRITE CATERING,
LLC dba BI-RITE CATERING &
COMMISSARY KITCHEN, a California
limited liability company; BI-RITE DIVIS,
INC., a California corporation; and DOES 1
through 25, inclusive,

Defendants.

Case No.: CGC-24-611385

Honorable Jeffrey S. Ross
Department 613

**DECLARATION OF PLAINTIFF
CONNOR BROWN IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: March 12, 2026
Time: 9:00 a.m.
Dept: 613

Complaint Filed: January 3, 2024
FAC Filed: February 27, 2024
Trial Date: Not Set

1 **DECLARATION OF CONNOR BROWN**

2 I, Connor Brown, declare and state as follows:

3 1. I am over the age of eighteen (18) and a resident of the State of California. I am the
4 named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements
5 set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

6 2. I was employed by Defendants Bi-Rite Management Services LLC, Bi-Rite Market,
7 Inc. dba Bi-Rite Family of Businesses, Bi-Rite Catering, LLC dba Bi-Rite Catering & Commissary
8 Kitchen, and Bi-Rite Divis, Inc. (collectively, "Defendants") as an hourly-paid, non-exempt Cashier
9 and Stocker from approximately August 2019 to approximately March 2023.

10 3. Because I thought the practices at Defendants may not be lawful, I decided to seek legal
11 advice about my work experience at Defendants and about filing a lawsuit to obtain relief for my
12 grievances. I contacted Blackstone Law, APC and spoke with their attorneys. I wanted to take steps
13 to make sure Defendants were held accountable for not properly compensating their employees for all
14 hours worked and for non-compliant meal and rest breaks. After speaking with the attorneys, I also
15 investigated class and representative action lawsuits on my own. Thereafter, I further consulted with
16 the attorneys at Blackstone Law, APC about my situation, class actions, representative action lawsuits
17 under the Private Attorneys General Act ("PAGA"), and what it meant to bring a class and PAGA
18 action so that I understood what I was considering doing.

19 4. I have regularly conferred with my attorneys regarding the case as part of my
20 responsibilities as a class and PAGA representative. This process included searching for and providing
21 documents concerning my employment with Defendants, answering any questions my attorneys had
22 about the documents, providing information regarding the companies' practices and the duties of other
23 hourly-paid and/or non-exempt employees, and helping my attorneys develop a strategy as to what
24 additional documents and information they could seek to obtain from Defendants.

25 5. I routinely checked in with my attorneys and their staff to make sure that they had all
26 of my most current information and any additional information that I had obtained. I made myself
27 available to answer any questions my attorneys had about Defendants' practices and treatment of their
28 employees whenever they needed me. I responded to them as quickly as possible and gave them as

1 much information as I could. Additionally, I helped my attorneys respond to written discovery, which
2 included verified responses to Defendants' Form Interrogatories – General (Set One), Form
3 Interrogatories – Employment Law (Set One), Special Interrogatories (Set One), Request for
4 Admission (Set One), and Request for Production of Documents (Set One). I also assisted my
5 attorneys in their efforts to prepare for mediation. Additionally, I made myself available on the day
6 of mediation to assist with any questions or issues that may have arisen.

7 6. I believe my claims are typical of the Class because Defendants engaged in a pattern
8 and practice of wage abuse against their hourly-paid and/or non-exempt employees, such as requiring
9 myself and the other Class Members to work off-the-clock without compensation, failing to properly
10 pay overtime wages and minimum wages for all hours worked, failing to provide all meal and rest
11 breaks to which we were entitled and failing to pay meal and rest break premiums when due, failing
12 to timely pay wages during employment and upon termination of employment, failing to provide
13 accurate wage statements, and failing to reimburse necessary business-related expenses.

14 7. I understood that in the event this matter did not settle and proceeded with trial, I would
15 need to be in court to participate in the trial. I was ready to perform that role, as well as fulfill any
16 responsibilities that are necessary for this lawsuit.

17 8. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
18 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
19 also understood there was a risk of losing any job and/or income due to the time that I would have to
20 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. Most
21 importantly, I believe that by pursuing this case, I have taken a significant risk because future
22 employers can easily find out that I sued my prior employer, and that may negatively impact my ability
23 to find employment within this industry – and even outside of it – in the future. In contrast, the other
24 employees who will be receiving money from this lawsuit did not have to file a claim or take the risk
25 that I took in bringing this action. In fact, I was aware that it is possible, and relatively easy, to perform
26 background checks of publicly filed documents on the internet, sometimes nothing more than a simple
27 Google search. Attached hereto as **Exhibit 1** is a true and correct copy of the results of a search for
28 “Brown v. Bi-Rite” entered on Google.com, accessed on January 27, 2026.

9. I reviewed the settlement agreement, discussed the settlement agreement with my attorneys, and asked them questions before signing it. I also reviewed the amended settlement agreement.

10. I believe that I have done everything that my attorneys have asked of me and tried, to the best of my ability, to seek relief for the Class, the PAGA Employees, and the State of California. I have spent approximately 45-50 hours participating in this case as described above. I believe my efforts helped get the result obtained in this case.

11. I understand that any resolution of this lawsuit on a class wide basis is subject to court approval, and any settlement must be designed in the best interest of the Class as a whole. At all times throughout the course of this litigation I have considered the interests of the Class and put them before my own personal interests. I believe I have adequately represented the Class and will continue to do so throughout the course of this litigation.

12. I understand that incentive or enhancement awards are discretionary and intended to compensate named plaintiffs for: the quality and quantity of the work done on behalf of the class and other employees, the financial and/or reputational risk undertaken in bringing the class and/or PAGA action, and an acknowledgment of the benefits resulting from the representative's actions. I believe my work in this matter is meritorious on these points for the reasons set forth above.

13. I respectfully request that the Court approve and award me an Enhancement Payment in the amount of \$10,000.00 for my efforts and active participation in the case and for the broader, general release of all claims that I have or may have against Defendants in connection with the settlement. Taking into consideration the time that I dedicated to this case, I believe that this amount is reasonable.

14. I am not related to anyone associated with Blackstone Law, APC.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 01/27/2026, at Los Angeles, California.

Connor Brown

Connor Brown

EXHIBIT 1

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Brown v. Bi-Rite Management Services LLC, et al.

Dec 16, 2025 — Learn more and see key documents, dates, and case details for **Brown v. Bi-Rite Management Services LLC, et al.**



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NOTICE OF CLASS ACTION SETTLEMENT Connor Brown v ...

Nov 18, 2025 — YOU ARE NOTIFIED THAT: A class and representative action settlement has been reached between Plaintiff Connor. **Brown** ("Plaintiff") and ... [Read more](#)

14 pages



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Connor Brown Vs. Bi-Rite Management Services Llc, A ...

The complaint seeks damages, statutory wage penalties, interest on unpaid compensation, attorneys' fees, and other relief for the plaintiff and similarly ... [Read more](#)



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Connor Brown v. Bi-rite Management Services Llc, A ...

Connor Brown v. Bi-rite Management Services Llc, A California et al, Case No. CGC-24-611385 in the Superior Court of California, County of San Francisco.



McCormack Law Firm

<https://bmclaw.com> › 2025/03 › san-francisco-bi-rite-...

San Francisco's Bi-Rite Grocery Chain Sued Over Alleged ...

Mar 17, 2025 — The lawsuit, led by former **Bi-Rite** employee Connor **Brown**, alleges that the company engaged in a "pattern and practice of wage abuse" against ... [Read more](#)

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SFGATE

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San Francisco Chronicle

<https://www.sfchronicle.com> › Food › Restaurants

S.F. cult favorite grocery store faces wage theft lawsuit

Jan 5, 2024 — The lawsuit, which Connor **Brown** filed in San Francisco County Superior Court on Jan. 3, alleges **Bi-Rite** engaged in a "pattern and practice of ... [Read more](#)

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Not Motion in BIRITE RESTAURANT SUPPLY, INC. ...

On August 25, 2017 a Summons was filed involving a dispute between **Birite** Restaurant Supply, Inc., and **Brown**, Jacob, **Brown**, Rhonda, **Brown & Sons, LLC**, ... [Read more](#)



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Eater San Francisco

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Beloved Grocery Chain Bi-Rite Hit with Lawsuit Over ...

Jan 5, 2024 — **Workers filed a class action lawsuit against local San Francisco grocery chain Bi-Rite on January 3, accusing the store of rest break and wage statement** ... [Read more](#)

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