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Attorneys for Plaintiff 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

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 606

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

Date: November 10, 2025
Time: 11:00 a.m.
Dept: 606

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.

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

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

12 8. I know that I took a sizeable risk by bringing and pursuing this lawsuit for several
13 reasons. First, I understood that if I lost, I would potentially have to pay the costs in the lawsuit. I
14 also understood there was a risk of losing any job and/or income due to the time that I would have to
15 spend fulfilling my responsibilities in this matter, including having to attend the trial, if needed. Most
16 importantly, I believe that by pursuing this case, I have taken a significant risk because future
17 employers can easily find out that I sued my prior employer, and that may negatively impact my ability
18 to find employment within this industry – and even outside of it – in the future. In contrast, the other
19 employees who will be receiving money from this lawsuit did not have to file a claim or take the risk
20 that I took in bringing this action.

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

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

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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 08/25/2025, at Los Angeles, California.

Connor Brown

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