JUSTICE FOR WORKERS, P.C.
William C. Sung SB# 280792
E-Mail: william@justiceforworkers.com
Tiffany L. Luu SB# 335127
E-Mail: tluu@justiceforworkers.com
3600 Wilshire Boulevard, Suite 1815
Los Angeles, CA 90010
Tel: 323-922-2000
Fax: 323-922-2000

Attorneys for Plaintiff MICHAEL CASTRO

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ALAMEDA

MICHAEL CASTRO, an individual and on behalf of all others similarly situated;

Plaintiff,

vs.

BRITE NITES, INC., an Utah corporation; and DOES 1 through 50,

Defendants.

Case No.: 24CV061873

[Assigned for All Purposes to:
Hon. Somnath Raj Chatterjee, Dept. 21]

DECLARATION OF MICHAEL CASTRO IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT, ATTORNEY'S FEES AND COSTS, AND SERVICE AWARD

(Filed concurrently with Motion for Final Approval; Supporting Declarations; and [Proposed] Judgment and Order)

DATE: December 15, 2026
TIME: 2:30 p.m.
DEPT: 21
RESERVATION ID: 872032357444

Action Filed: January 30, 2024
Trial Date: Not Set

I, Michael Castro, hereby declare as follows:

1. I am an individual over the age of 18 year and the named Plaintiff in the above-captioned matter. This declaration is submitted in support of approval of the proposed class action settlement ("Settlement") reached in this case. I have personal knowledge of the facts contained in this declaration, and if called as a witness, could and would testify as to their accuracy.

2. I was employed by Defendant Brite Nites, Inc. ("Defendant") as an hourly-paid lighting and décor installer in Northern California in approximately December 2023 and misclassified me as an independent contractor. During my employment with Defendant, I was subject to Defendant's wage and hour policies and practices that are at issue in this case.

3. Specifically, I was subject to Defendant's control and direction in the performance of my holiday décor installation work; I performed work within the usual course of Defendant's business—i.e., installation of holiday decorations; and I was not engaged in an independently established trade, occupation, or business. When I worked for Defendant, I regularly worked more than 8 hours in a shift but I was not paid any overtime premiums, I did not receive all of my meal and rest breaks, I had to use my personal cellphone to clock in and out and communicate with Defendant without reimbursement, and I did not receive any paystubs. As a result of the foregoing issues, I believe I was not paid all wages when my employment with Defendant ended. I believe other non-exempt misclassified employees of Defendant were subject to the same policies and procedures discussed above and that my claims against Defendant for unpaid wages and statutory and civil penalties are typical of Class Members' claims.

4. I have been actively involved in this case since I first retained Justice for Workers, P.C. ("JFW") in December 2023. Without waiving the attorney-client privilege, prior to filing this lawsuit, my attorneys explained my role and responsibilities as a Class Representative, and I understand my responsibilities as a Class Representative. Since retaining my attorneys, I have had many discussions and meetings with the attorneys and staff at JFW, discussions regarding Defendant's wage and hour practices and my claims in this case, litigation strategy, updates on how the case was proceeding, the Settlement, and how I could help the case and potential Class Members. I also gathered and reviewed documents for use in the lawsuit and reviewed relevant

Doc ID: 1245cc41243a7e18ac481bd3ed0d474ce95b7512

documents with my attorneys. I estimate that I have spent at least 20 hours on this case from the time I first spoke with my attorneys regarding this case until the present. I also understand that as part of the Settlement, I have agreed to a general release of claims against Defendant, which is broader than the release of claims agreed to by other Class Members.

5. Furthermore, there is no conflict between my interests and the interests of the class that I am seeking to represent. My interests are entirely coextensive with the interests of the Class. I allege that I was injured by the same company-wide policies and practices to which the proposed Class was subjected and seek the same relief. I have already demonstrated my ability to advocate for the interests of the Class by initiating this litigation, undertaking extensive class discovery, and evaluating the proposed settlement to assure that it is fair.

6. I understood that at the time I filed this action, as a Class Representative, I owed a duty to the putative class members to faithfully prosecute this action with their best interests at the forefront of every decision. I understood that I could not make any decision in this action for the sole benefit of my personal interest. I understood that in executing this duty, I might have been asked to sacrifice my personal best interests for the benefit of the interests of the putative class members. Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible relief for my former co-workers for what I perceived to be Defendant's unlawful wage and hour practices. I believe that I faithfully executed the duties of a Class Representative throughout this litigation and will continue to do until this litigation is fully and finally resolved.

7. I understand that my attorneys will request that the Court approve a service award of $7,500.00 for my efforts on behalf of the Class. I believe this amount is reasonable based on the amount of time and effort I have devoted to this case, the risks I have undertaken as a Class Representative including being sued by Defendant, and my general release of claims, as described above. My support for the Settlement is not contingent on my receiving this service award.

8. I do not have any conflict of interest with the proposed Settlement Administrator, Apex Class Action LLC. I also do not have any conflict of interest with the proposed Cy Pres Recipient, Legal Aid Foundation of Los Angeles.

/ / /

Doc ID: 1245cc41243a7e18ac481bd3ed0d474ce95b7512

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

Executed on April 6, 2026 at San Pedro, California.



Michael Castro

Doc ID: 1245cc41243a7e18ac481bd3ed0d474ce95b7512