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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

GREGORY BRULE, 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.

CATALINA ISLAND COMPANY, a
California corporation; SANTA
CATALINA ISLAND COMPANY, a
Delaware corporation; and DOES 1
through 100, inclusive,

Defendants.

Case No. 24LBCV00582

Honorable Mark C. Kim
Department S27

CLASS ACTION

**DECLARATION OF PLAINTIFF
GREGORY BRULE IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: March 6, 2025
Time: 8:30 a.m.
Department: S27
Reservation ID: Specially Set by Court

Complaint Filed: March 21, 2024
FAC Filed: August 19, 2024
Trial Date: None Set

DECLARATION OF GREGORY BRULE

I, **Gregory Brule**, hereby declare as follows:

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

2. I was employed by Catalina Island Company and Santa Catalina Island Company (collectively, the “Defendants”) from approximately June 2014 to approximately October 2023 as a salaried exempt employee and from approximately October 2023 to present as an hourly-paid, non-exempt employee. I decided to seek legal advice about my work experiences with Defendants and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendants were held accountable for not properly compensating their employees for all hours worked, non-compliant meal and rest breaks, and failure to reimburse expenses. I consulted with the attorneys and staff at Lawyers *for* Justice, PC discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative. Prior to commencing the case, I was informed of and came to understand what my duties and responsibilities would be as a plaintiff and a PAGA representative. Prior to asserting class claims, I was informed of and came to understand what my duties and responsibilities would be in the event that class certification were to be obtained and if I were to be appointed as a representative of the class.

3. Throughout the case, I have spent time speaking with my attorneys regarding the case and fulfilling my responsibilities as a class representative and PAGA representative, which included gathering documents concerning my employment with Defendants, reviewing documents with my attorneys, answering questions, providing guidance regarding the duties of other salaried employees misclassified as exempt and other non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendants. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

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4. Throughout this matter, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent time speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendants.

As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I reviewed the Memorandum of Understanding and the Settlement Agreement and discussed the questions I had regarding the potential settlement with my attorneys before signing the settlement papers.

5. I think my efforts helped to get the result obtained in this matter, and as a potential class and PAGA representative, I respectfully request that the Court award me a service payment in the amount of \$7,500.00 for my efforts in pursuing and participating in this matter, as well as my broader release of claims. Taking into consideration the time that I have dedicated to this matter and the risks of filing a public lawsuit against my current employer, I believe that this amount is reasonable because I have agreed to provide a general release of claims to Defendants, which no other employee is providing as part of this settlement.

6. I am not related to anyone associated with Lawyers *for* Justice, PC.

7. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as an enhancement award, as well as my share of the settlement as a class member and aggrieved employee.

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

Executed on 01/27/2025, at Ontario, California

Electronically Signed 2025-01-27 19:38:27 UTC - 174.193.131.62
Nintex AssureSign®  cdf102da-e569-4ae2-a373-b27201397a7

Gregory Brule