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Attorneys for Plaintiff and the Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

JUSTIN BUI, as an individual and on behalf of all
others similarly situated,

Plaintiff,

vs.

THE RANCH STEAKHOUSE AND SALOON,
INC., a California corporation; RGB SYSTEMS,
INC., a California corporation; and DOES 1
through 50, inclusive,

Case No. 24CV439149

**DECLARATION OF JUSTIN BUI IN
SUPPORT OF MOTION TO APPROVE
SETTLEMENT AGREEMENT PURSUANT
TO THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: March 20, 2025

Time: 1:30 p.m.

Dept.: 7

1 I, Justin Bui, hereby declare and state as follows:

2 1. I am an individual over the age of 18. I am the named plaintiff in the above-reference
3 action. I have personal knowledge of the facts set forth below and if called to testify I could and would
4 do so competently.

5 2. I previously worked for The Ranch Steakhouse and Saloon, Inc. & RG Systems, Inc. (the
6 “Company”) during the approximate period of June 29, 2023 to September 28, 2023. For the duration of
7 my employment, I was a non-exempt employee.

8 3. The Company used an electronic timekeeping system to track and record my hours
9 worked. The timekeeping system captured my time entries to the minute, but rounded the daily total
10 hours worked to the nearest quarter hour. The Company calculated and paid wages based on the rounded
11 hours. I believe the rounding caused me and other employees to lose pay.

12 4. Shortly before I voluntarily resigned from the Company, I complained to both human
13 resources and my supervisor that the rounding of my daily hours worked was illegal and deprived
14 employees of overtime.

15 5. I filed this lawsuit because I was concerned that the Company’s rounding policies
16 resulted in employees being shortchanged on their wages. By bringing a representative action lawsuit, I
17 hoped that I might be able to change the Company’s policies to better protect the working conditions of
18 other workers.

19 6. However, I did not make the decision to file a representative action lightly. I was
20 concerned by the attention that a lawsuit would attract in the workplace and the reputational harm that
21 may result, including the perception that I am difficult to work with. Although the lawsuit is justified,
22 my current or prospective employer might find out that I sued the Company, and there is a risk of facing
23 retaliation and strained relationships with colleagues and supervisors. Nevertheless, I felt that important
24 rights were at stake that hurt everyone, and something ought to be done about it.

25 7. I respectfully request that the Court award a \$10,000 enhancement payment. I have done
26 my best to represent the interests of the employees that are part of this settlement. I have actively
27 contributed to this case. This includes: (1) participating in numerous telephonic meetings with my
28 attorneys and their staff; (2) reviewing and signing the PAGA Notice; (3) reviewing the Complaint; (4)

1 providing my attorneys with information and documents; and (5) reviewing and executing the settlement
2 agreement.

3 8. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive
4 accomplishment and understand that other people will benefit because of the actions that I have taken.

5 9. I do not believe I have any interests that are adverse to the other employees that are part
6 of the settlement.

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

9 Executed on 01/30 2025, at Orange, California.

11  Justin Bui Jan 30, 2025 15:15 PST

12 Justin Bui