

John G. Yslas (SBN 187324)
john.yslas@wilshirelawfirm.com
Eugene Zinovyev (SBN 267245)
Eugene.zinovyev@wilshirelawfirm.com
Gabriella Solé (SBN 346164)
Gabriella.sole@wilshirelawfirm.com
WILSHIRE LAW FIRM, PLC
660 S. Figueroa Street, Sky Lobby
Los Angeles, CA 90017
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiff Keith Brundage

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF YUBA**

CHRISTINE MOORE and KEITH
BRUNDAGE in a Representative capacity
only, and on behalf of other members of the
general public similarly situated,

Plaintiff,

v.

NOR CAL FAST FOODS, INC. d.b.a.
BURGER KING, a California Corporation;
BURGER KING COMPANY LLC, a Florida
Limited Liability Company; and DOES 1 10,
inclusive,

Defendants.

Case No.: CVCV24-00858

**DECLARATION OF KEITH BRUNDAGE
IN SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR APPROVAL
OF PAGA SETTLEMENT**

Date:

Time:

Dept.: 4

Judge: Hon. Stephen W. Berrier

DECLARATION OF KEITH BRUNDAGE

I, Keith Brundage, declare as follows:

1. I am the named Plaintiff in the related matter, *Brundage v. Nor Cal Fast Foods, Inc.*, Alameda Superior Court Case No. 24CV105192, and one of the named Plaintiffs in the present action. I make this declaration in support of Plaintiffs' Unopposed Motion for Approval of PAGA Settlement.

2. I am personally familiar with the facts set forth in this declaration, and if called to testify as a witness I could and would do so.

3. I am a former employee of Defendant Nor Cal Fast Foods, Inc. ("Nor Cal Fast Foods"). I worked for Defendant from approximately July 2024 to March 2025.

Risks, Both Financial and Otherwise, Faced in Bringing the Suit

4. When I decided to become involved in this lawsuit as a private attorney general for the State of California, I understood that I was not only seeking civil penalties on behalf of myself and the State of California, but also for other aggrieved employees who worked for Defendant.

5. I was also made aware that being a private attorney general in an action filed on behalf of others would subject me to a stigma that is sometimes associated with those who bring these kinds of lawsuits. I was aware that, acting as a private attorney general, I might be responsible for some or all of Defendant's legal costs if the case was not successfully concluded. Even with knowledge of these risks, I was willing to go forward and to act on behalf of the other employees and the State of California, but I was nervous about losing and having a judgment filed against me for costs or losing job opportunities in the future.

6. I understood that there were risks involved in representative action lawsuits. I understood that the lawsuit could continue for several years and require my services and attention throughout the entire length of the lawsuit. I learned that even if I won at trial, the case could be further delayed by appeals.

7. I have spent a substantial amount of time and effort on this litigation. My work on this case has included, among other things, gathering and providing my employment records, discussing my experiences working for Defendant, and participating in settlement discussions.

After mediation, I remained actively involved by reviewing the settlement papers and regularly contacted my counsel for updates. I estimate that since I retained my counsel, I have spent approximately 23 hours on the activities described above.

8. Absent the requested service payment, the personal benefit I will receive is the same as all other employees. But unlike the other employees, I have signed a general release of Defendant. The other employees are only releasing their claim for civil penalties under PAGA as asserted in the lawsuit.

9. I have no actual or potential conflict of interest with the Aggrieved Employees in this PAGA Action or with the Settlement Administrator.

10. My interests as a named plaintiff in this case are not adverse to the interests of the other hourly-paid non-exempt employees. I believe my interests are the same as the other employees because we were all subject to the same policies and practices and were similarly injured by Nor Cal Fast Foods's company-wide policies and practices. I am seeking the same recovery on behalf of myself and the other employees, which is to collect unpaid wages, penalties, and interest that are owed to us by Nor Cal Fast Foods.

11. I have always kept the best interests of the other hourly-paid non-exempt employees in mind while performing my duties as the named plaintiff in my case. I have been committed throughout the course of this case to vigorously prosecuting this case on behalf of myself and the other employees. I believe that I have demonstrated my ability to advocate for the interests of the other hourly-paid non-exempt employees by initiating this lawsuit, providing information to my attorneys, keeping in regular contact with my attorneys regarding the status of the case, and reviewing the settlement agreement to make sure it was fair.

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