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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SAN FRANCISCO**

10 AMOURAFINA BURTON, an individual and
11 on behalf of all others similarly situated;

12 Plaintiff,

13 vs.

14 KINETIC EVENTS, INC., a California
15 corporation; ATRIUM PAYROLL
16 SERVICES, LLC, a New York limited liability
company; and DOES 1 through 50,

17 Defendants.
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Case No.: CGC-24-618367

[Assigned for All Purposes to:
Hon. Ethan P. Schulman, Dept. 304]

**DECLARATION OF AMOURAFINA
BURTON IN SUPPORT OF MOTION
FOR APPROVAL OF PAGA
SETTLEMENT**

(Filed concurrently with Motion for Approval
of PAGA Settlement; Supporting
Declarations; and [Proposed] Order)

DATE: October 13, 2026

TIME: 11:00 a.m.

DEPT: 304

Action Filed: September 24, 2024

Trial Date: Not Set

1 I, Amourafina Burton, hereby declare as follows:

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

6 2. I was employed by Defendants Kinetic Events, Inc. ("Kinetic") and Atrium Payroll
7 Services, LLC ("Atrium") as a non-exempt employee as event staff from approximately December
8 2022 to approximately June 14, 2024. During my employment with Defendant, I was subject to
9 Defendant's wage and hour policies and practices that are at issue in this case.

10 3. Specifically, my meal and rest breaks were often interrupted by customers and
11 coworkers and I was not able to take compliant meal and rest breaks. Defendants calculated my
12 hours worked based on my scheduled time instead of my actual clock in and out time, resulting in
13 unpaid wages. I used my personal cellphone to clock in and out on an application but was not
14 reimbursed cellphone expenses. As a result of the foregoing issues, I believe I received inaccurate
15 wage statements and was not paid all wages when my employment with Defendant ended. I believe
16 other non-exempt employees of Defendant were subject to the same policies and procedures
17 discussed above and that my claims against Defendant for unpaid wages and statutory and civil
18 penalties are typical of Class Members' claims.

19 4. I have been actively involved in this case since I first retained Justice for Workers,
20 P.C. ("JFW") in December 2024. Without waiving the attorney-client privilege, prior to filing this
21 lawsuit, my attorneys explained my role and responsibilities as a PAGA representative, and I
22 understand my responsibilities as a PAGA representative. Since retaining my attorneys, I have had
23 many discussions and meetings with the attorneys and staff at JFW, discussions regarding
24 Defendant's wage and hour practices and my claims in this case, litigation strategy, updates on how
25 the case was proceeding, the Settlement, and how I could help the case and potential Aggrieved
26 Employees. I also gathered and reviewed documents for use in the lawsuit and reviewed relevant
27 documents with my attorneys. I also responded to a significant amount of written discovery requests
28 and I sat for a deposition by Defendants. I estimate that I have spent at least 30 hours on this case

1 from the time I first spoke with my attorneys regarding this case until the present.

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

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

18 7. I understand that my attorneys will request that the Court approve a service award
19 of \$10,000.00 for my efforts on behalf of Aggrieved Employees. I believe this amount is reasonable
20 based on the amount of time and effort I have devoted to this case and the risks I have undertaken as
21 a PAGA representative. My support for the Settlement is not contingent on my receiving this
22 service award.

23 8. I am not aware of any other pending matter or action asserting claims that will be
24 extinguished or adversely affected by the Settlement

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

3 Executed on July 2, 2026 at Rosamond, California.
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5 *Amourafina Burton*

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Amourafina Burton
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