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Attorneys for PLAINTIFF

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF TEHAMA

CHRISTOPHER VANDERBEEK, an
individual, on behalf of himself, and on behalf of
all persons similarly situated,

Plaintiff,

v.

OUTBACK CONTRACTORS, INC., a
California corporation; and DOES 1-50,
Inclusive,

Defendants.

Case No. 24CI-000225

**DECLARATION OF CHRISTOPHER
VANDERBEEK IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: September 9, 2026
Time: 8:30 a.m.

Judge: Hon. Matthew C. McGlynn
Dept.: 5

1 I, CHRISTOPHER VANDERBEEK, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am the lead named Plaintiff in the
4 above wage and hour class action filed against OUTBACK CONTRACTORS, INC., a California
5 corporation ("Defendant").

6 2. This declaration is being submitted in support of Plaintiff's motion for Preliminary
7 Approval of Class and PAGA Action Settlement.

8 3. I believe that I am, have been and will continue to represent the interests of the class
9 fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking
10 to represent.

11 4. I worked for Defendant as a non-exempt employee, paid on an hourly basis in addition
12 to non-discretionary bonuses, in Tehama, California from June 2023, to September 2023, as a non-
13 exempt employee. At all times during my employment, I was classified by Defendant as a non-exempt
14 employee, paid on at an hourly rate, and was entitled to legally compliant meal and/or rest periods and
15 minimum, regular and overtime wages for all hours worked. Throughout my employment, I was
16 subject to Defendant's written policies and procedures contained in, among other documents, the
17 Employee Handbook.

18 5. Generally, my lawsuit claims that Defendant failed to provide accurate itemized wage
19 statements, failed to provide meal and rest breaks, failed pay for all hours worked, failed to reimburse
20 employees for mandatory business expenses, and failed to timely pay all wages due upon separation
21 of employment.

22 6. I believe that my claims are typical of the claims of the Class Members that I am seeking
23 to represent because I was subject to the same alleged unlawful employment policies and practices at
24 issue in this action, including but not limited to, Defendants' failure to provide accurate itemized wage
25 statements, failure to provide meal and rest breaks, failure pay for all hours worked, failure to
26 reimburse employees for mandatory business expenses, and failure to timely pay all wages due upon
27 separation of employment. Factually, Defendant's policies and practices apply class wide, and
28 Defendant's liability can be determined by facts common to all members of the Class.

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

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

16 9. I believe that the proposed settlement before the Court is fair, reasonable and adequate,
17 and made in the best interest of the Class Members. Consequently, I respectfully, and humbly, ask the
18 Court to grant preliminary approval of the Settlement and all of its terms.

19
20 I declare under the penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct. Executed on 08/03/2026 (date), in Red Bluff, (city)
22 California.

23
24 By: 
25 chris vanderbEEK (Aug 3, 2026 20:19:46 PDT)
26 CHRISTOPHER VANDERBEEK
27
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