

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Sean M. Blakely (SBN 264384)
sblakely@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff Anna Cardoso

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO

Paloma Scalise, Anna Cardoso, and Demarco
Evans, individually and on behalf of all others
similarly situated,

Plaintiff,

vs.

Chipotle Services LLC, DBA Chipotle Mexican
Grill, Inc; and DOES 1 through 20, inclusive,

Defendants.

Case No. 23CV006629

Hon. Lauri A. Damrell

**DECLARATION OF PLAINTIFF ANNA
CARDOSO IN SUPPORT OF
APPROVAL OF SETTLEMENT**

Date: August 22, 2025

Time: 9:00 a.m.

Dept.: 22

Action Filed: August 10, 2023

Trial Date: None Set

DECLARATION OF ANNA CARDOSO

I, Anna Cardoso, declare as follows:

1. I am an individual over the age of 18 and I am one of the named plaintiffs in this matter against Chipotle Services LLC, DBA Chipotle Mexican Grill, Inc. ("Chipotle"). This declaration is submitted in support of approval of the Settlement Agreement reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for Chipotle as a non-exempt employee in the position of "Crew" until approximately November 2022.

3. While working for Chipotle, I was subject to their wage and hour policies and practices at issue in this case. During my employment, there were multiple occasions where I was required to complete work while off the clock. For example, I was asked to review and sign documents related to company protocols, attendance expectations, and dispute resolution documents while not being clocked in for work. On one occasion, I signed a series of documents outside of my shift hours and was only paid for two minutes of time, despite the fact that I spent significantly longer reviewing and completing the forms. As a result of these timekeeping policies and practices, I believe I was not compensated for all of the hours that I worked.

4. During my employment with Chiptole, I was not always provided with compliant meal and rest breaks. There were many shifts where I was not able to begin my meal break until after working more than five hours or my meal break was cut short due to work demands. On days when I worked over 10 hours, I was not always provided a second meal break. In addition, my rest breaks were often interrupted due to the demands of my job duties. I was often not relieved of all work responsibilities during my rest breaks, nor was I allowed a third rest break on longer shifts. While working for Chipotle, I was required to use my personal cell phone to access the Workforce application in order to view my schedule, submit sick leave requests, and review accrued vacation time, but Chipotle did not reimburse me for my cell phone expenses. As a result of these violations, I understand that I was not provided with accurate, itemized wage statements.

5. On May 22, 2023, I filed a representative action complaint for civil penalties under

1 the Private Attorneys General Act (“PAGA”) in Los Angeles Superior Court, in the matter entitled
2 *Anna Cardoso v. Chipotle Services, LLC*, Case No. 23STCV11524.

3 6. When I filed my lawsuit, I understood that it could benefit my former coworkers,
4 other Chipotle employees, and the State of California by helping to recover penalties on their
5 behalf as a result of the alleged violations described above. I also understood that I was filing this
6 case as an “aggrieved employee” on behalf of myself and my fellow “aggrieved employees” as
7 well as the State of California.

8 7. When I filed this lawsuit, I knew there was a risk I could be liable for Chipotle’s
9 costs if we lost the case. I also understood that filing a lawsuit is a public record. However, I
10 accepted those risks so that I could help recover penalties on behalf of other Chipotle employees
11 and the State of California. Even though I assumed these risks, to date, I have not suffered any
12 actual adverse consequences because I filed this lawsuit.

13 8. I have been actively involved in this case since it started in 2023. Without waiving
14 the attorney-client privilege, I have had many phone conversations and meetings with my
15 attorneys throughout this case to discuss Chipotle’s wage and hour policies and practices, identify
16 potential witnesses, and discuss case strategy. I also gathered and reviewed documents for use in
17 the lawsuit and reviewed relevant documents with my attorneys. I estimate that I have spent
18 approximately 35-40 hours performing these activities in order to help the case.

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

24 I declare under penalty of perjury under the laws of the State of California and the United
25 States that the foregoing is true and correct. Executed on July ³⁰____, 2025
26 at _____, Los Angeles, California.

27
28

EDF79B4E526A4DC...
Anna Cardoso