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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF ALAMEDA**

13
14 **CHRISTOPHER BRANDMEIR,**
individually and on behalf of all others
similarly situated,

15
16 Plaintiffs,

17 vs.

18 **COLUMBIA SOUTHERN UNIVERSITY,**
19 **INC.,** an Alabama Corporation,

20
21 Defendant.

CASE NO. 22CV013638

**DECLARATION OF CHRISTOPHER
BRANDMEIR IN SUPPORT OF
PLAINTIFF'S MOTION FOR ATTORNEYS'
FEES, COSTS, AND SERVICE AWARD
FOR CLASS REPRESENTATIVE**

Date: August 25, 2023
Time: 9:30 a.m.
Dept. 23; Hon. Brad Seligman
Reservation No: A-13638-003

1 I, Christopher Brandmeir, declare as follows:

2 1. I have personal knowledge of the following facts and could and would testify competently
3 thereto if called upon to do so. I am over 18 years of age. I am the named Plaintiff and Class
4 Representative of the provisionally certified settlement Class in the above-captioned action.

5 2. I respectfully submit this declaration in support of Plaintiff's Motion for Approval of
6 Attorneys' Fees, Costs, and Service Award for the Class Representative.

7 3. I make this declaration in support of my request for a Service Award of \$7,500 for my
8 time and efforts spent in pursuing the case against the named Defendant, and in consideration of the fact
9 that, unlike the other Class Members, I am entering into a general release of all claims against Defendant.

10 4. I have been involved in all aspects of the litigation from the beginning to date and have
11 done my best to represent the class, including by assisting my attorneys in pursuing this matter, promptly
12 responding to their questions and requests for me to search and send them documents related to my
13 employment.

14 5. Before the case was filed, I spoke to one of my attorneys Polina Brandler to discuss my
15 employment at Columbia Southern University ("CSU") and my potential claims. During our initial call,
16 I also discussed with Ms. Brandler my obligations as a named Plaintiff and Class Representative.

17 6. Following our initial conversation, and over the course of several weeks, I searched my
18 files to collect and send to my attorneys documents relevant to my employment with CSU, as my
19 attorneys asked me to do.

20 7. I spent approximately two to three hours speaking to Ms. Brandler, searching for and
21 gathering documents related to my employment with CSU, and sending them to my attorneys.

22 8. Thereafter, I carefully reviewed drafts of the PAGA Notice and the Complaint to confirm
23 that they were accurate. I also discussed the drafts with my attorneys, provided feedback to my attorneys,
24 and searched and sent to my attorneys additional documents in support of my claims. I spent
25 approximately three hour(s) reviewing the two documents, discussing them with my attorneys, and
26 searching for and sending additional documents to my attorneys.

27 9. After the PAGA Notice was submitted and the Complaint was filed, I took an active role
28 in the case, including reviewing the Answer filed by Defendant, and stayed in touch with my attorneys
as they provided me with updates about the case.

10. My attorneys and Defendant participated in a settlement negotiations session in December
2023. Prior to the settlement negotiations session, I had several calls with my attorneys during which we

1 discussed my claims, and I responded to their additional questions in order to assist them in preparing for
2 the negotiations.

3 11. After the settlement negotiations session concluded, Class Counsel advised me regarding
4 the proposed settlement and I approved it.

5 12. I carefully reviewed and discussed with my attorneys the Settlement Agreement prior to
6 signing it. I estimate that I spent approximately two and a half hours doing this.

7 13. After the formal settlement agreement was signed by all parties, I kept in touch with my
8 attorneys about the settlement approval process, the scheduling of the settlement approval hearing, and
9 timing of the final approval hearing. I also discussed this declaration with my attorneys, commented on
10 it, and reviewed it carefully before signing it, which took approximately 45 minutes to one hour.

11 14. In summary, I have been responsive to all of the requests for assistance that my attorneys
12 made of me, and promptly looked for and sent the relevant documents as my attorneys asked me to do.
13 I have acted in the best interests of the Class, and I devoted substantial time to various aspects of the case
14 and for the benefit of the Class. I do not have any legal conflicts with any members of the Class.

15 15. In total, I estimate that I have spent at least 10 to 11 hours performing work on this case
16 discussed above.

17 16. I assumed all of the risks associated with being a named plaintiff, including the risk that I
18 may be perceived by CSU, and other employers in the industry, as a litigious employee. Nonetheless, I
19 decided to bring this lawsuit to ensure that CSU follows the laws requiring it to pay its faculty members
20 properly and reimburse their necessary expenses incurred in carrying out their job duties for CSU.

21 I declare under penalty of perjury under the laws of the United States and the State of California that the
22 foregoing is true and correct. Executed on 7/25/2023, in valley village, California.

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Christopher Brandmeir
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