DISTRICT COURT OF NEW MEXICO SECOND JUDICIAL DISTRICT

MARIA GONZALEZ, individually and on behalf of all others similarly situated, Case No. D-202-CV-2025-00789 Plaintiff.

v. CLASS ACTION COMPLAINT CHICKEN BROTHERS RESTAURANT CHAIN, INC., a New Mexico corporation, JURY TRIAL DEMANDED Defendant.

CLASS ACTION COMPLAINT FOR DAMAGES

TO THE HONORABLE COURT:

Plaintiff Maria Gonzalez, individually and on behalf of all others similarly situated, brings this class action complaint against Chicken Brothers Restaurant Chain, Inc. for damages arising from contaminated food products that caused salmonella poisoning in hundreds of customers.

PARTIES

- 1. Plaintiff Maria Gonzalez is a 34-year-old resident of Albuquerque, New Mexico, who consumed contaminated chicken products at defendant's restaurant on January 20, 2025.
- 2. Defendant Chicken Brothers Restaurant Chain, Inc. is a New Mexico corporation with its principal place of business at 4500 Central Avenue SE, Albuquerque, NM 87108.

JURISDICTION AND VENUE

- 3. This Court has jurisdiction pursuant to NMSA '§ 38-3-1.
- 4. Venue is proper in Bernalillo County where defendant conducts substantial business operations.

CLASS ACTION ALLEGATIONS

- 5. This action is brought as a class action under Rule 1-023 NMRA on behalf of: All persons who consumed food products at Chicken Brothers restaurants between January 15-25, 2025, and subsequently contracted salmonella poisoning.
- 6. The class is so numerous that joinder is impracticable. More than 300 confirmed cases of salmonella linked to defendant's restaurants have been reported to health authorities.

FACTUAL ALLEGATIONS

- 7. Defendant operates 23 restaurant locations throughout New Mexico specializing in fried chicken and fast food.
- 0. On January 20, 2005, plaintiff numbered and consumer