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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 HAROLD JONES, et al.,
14 Plaintiffs,
15 vs.
16 CERTIFIEDSAFETY, INC.
17 Defendants.
18

Lead Case No. 3:17-cv-02229-EMC
Consolidated with 3:17-cv-03892-EMC (*Crummie*)
Related to: 3:18-cv-04379-EMC (*Ross*)
3:19-cv-01338-EMC (*Jones II*)
3:19-cv-01380-EMC (*Jones III*)
3:19-cv-01381-EMC (*Jones IV*)
3:19-cv-01427-EMC (*East*)
3:19-cv-01428-EMC (*Jones V*)

19 **DECLARATION OF SANDRA TURNER**

20 Date: May 28, 2020
21 Time: 1:30 p.m.
22 Courtroom: 5 (17th Floor)
23 Judge: Honorable Edward M. Chen

24 *Jones* Complaint filed: April 21, 2017
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DECLARATION OF SANDRA TURNER

Jones, et al. v. CertifiedSafety, Inc.; Lead Case No. 3:17-cv-02229-EMC

1 I, Sandra Turner, hereby declare as follows:

2 1. I am a Named Plaintiff in *Jones, et al. v. CertifiedSafety, Inc.*, pending in the United
3 States District Court for the Northern District of California.

4 2. I am over the age of eighteen. The following statements are based on my personal
5 knowledge. If called on to do so, I could and would testify competently to these statements.

6 3. I submit this declaration in support of Plaintiffs' Motion for Attorneys' Fees and
7 Costs and for Service Awards in these Actions.

8 4. I was employed by CertifiedSafety from approximately 2017 to 2018. I worked for
9 CertifiedSafety as a Safety Attendant. In this role, I provided safety support and implemented
10 safety protocols, including identifying, mitigating, and reporting potential safety hazards at
11 CertifiedSafety's worksites. I worked for CertifiedSafety at oil refinery sites in numerous locations
12 around the United States.

13 5. I worked long hours for CertifiedSafety. However, I was not paid for all of the hours
14 that I actually worked. For example, I had to go through security checks, traverse the refinery
15 locations, and put on and take off protective gear in order to do my job, but I was not paid for this
16 time. I was regularly unable to take compliant meal and rest breaks. Also, I paid out of my own
17 pocket for a variety of expenditures for my work.

18 6. As a result of these issues, I believed that I experienced wage violations and meal
19 and rest break violations. I knew that my co-workers had similar experiences.

20 7. I first heard that there was a class action pending against CertifiedSafety on behalf of
21 Safety Attendants when I received the Notice of Collective Action Lawsuit in the *Jones* action in
22 late 2017. I wanted to do something about these issues, so I decided to contact Schneider Wallace
23 Cottrell Konecky LLP. They are my attorneys in this case.

24 8. I first spoke to Schneider Wallace Cottrell Konecky LLP to discuss my work
25 experiences with Defendant in May 2018. I have been involved with these Actions ever since.

26 9. I became a Named Plaintiff in the *Jones* case when we filed the Fourth Amended
27 Consolidated Class and Collective Action Complaint on January 24, 2020. However, I stood ready
28 to serve as a Named Plaintiff prior to this.

1 10. Prior to my agreeing to serve as a Named Plaintiff, I had multiple telephonic
2 interviews with my attorneys. Generally, we discussed my work experiences, the law, and the
3 kinds of claims I could pursue. We also discussed the risks of a case like this.

4 11. I knew that there was no guarantee that we would be successful in this case, and that
5 there was a significant chance of protracted litigation. I understood I could potentially be liable for
6 fees and costs, and that there was a risk that some of the claims could be compelled to arbitration. I
7 also understood that I could have to spend a significant amount of time in the discovery process.

8 12. Additionally, I realized that my name would be on a class and representative action,
9 and that this information could be visible to others.

10 13. Nonetheless, I felt strongly that Defendant had unlawful wage and hour policies.
11 Therefore, I decided to proceed as a representative plaintiff and file a lawsuit. I understood that I
12 would serve as the Named Plaintiff, the representative of a proposed class of workers, and the
13 representative employee for claims under Ohio law. I am the Class Representative for the Ohio
14 Rule 23 Class.

15 14. I supplied information and documents to my attorneys to assist with the filing of my
16 claims under federal and Ohio law on behalf of myself and the other Safety Attendants that I
17 represent.

18 15. I estimate that I devoted at least 10 hours to the Actions during the initial interviews
19 with my attorneys and the court complaint process.

20 16. In late 2018, we discussed the possibility of a mediation in the hope of reaching a
21 class-wide settlement. We had further discussions ahead of the April 23, 2019 mediation. I cleared
22 my schedule and made myself available for the mediation.

23 17. I extensively communicated with my attorneys regarding the results of the mediation
24 and the essential terms of the Settlement that we reached.

25 18. I estimate that I spent approximately 2 hours on discussions with my attorneys
26 regarding the mediation.

27 19. After the proposed Stipulation of Class, Collective, and Representative Action (the
28 “Settlement”) was reached, I carefully reviewed the terms. The Settlement is a lengthy document,

1 and I reviewed it closely. I discussed it with my attorneys. I spent time evaluating the proposed
2 outcome to assure that it was fair. Based on my own review and my attorneys' evaluation and
3 recommendation, I believe the Settlement is fair and reasonable. I signed the Settlement on
4 November 20, 2019.

5 20. I estimate that I spent at least 3 hours carefully reviewing the Settlement and
6 discussing the terms with my attorneys.

7 21. Throughout this action, I have been in regular communication with my attorneys to
8 keep apprised of the status of the litigation. I have kept up-to-date on the status at every phase.
9 Over the past two years, I estimate that I have spent 5 hours on phone calls and emails regarding
10 status updates with my attorneys.

11 22. In sum, I worked with my attorneys to prepare the amended complaint; assembled,
12 discussed, and reviewed documents; participated actively in the mediation process and settlement
13 decisions; and otherwise remained in constant contact with my attorneys. I have been involved
14 with this litigation for approximately two years, and during that time I have contributed at least 20
15 hours of my own time to the prosecution of these claims.

16 23. By participating in this case as a Plaintiff, I placed myself at personal risk. For
17 example, I faced: (a) risk to my reputation in my community as a result of stepping forward
18 publicly in a class action; (b) risk to my reputation as it concerns my future employment
19 opportunities; (c) risk that I would be subject to intrusive discovery and time demands in this
20 litigation; and (d) risk that I would have to pay defense costs if I lost this case.

21 24. Nevertheless, I chose to face these risks to challenge the way that Defendant treated
22 its employees.

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24 I declare under penalty of perjury under the laws of the United States that the foregoing is
25 true and correct. Executed on this 22nd day of April, 2020, in La Marque, Texas.

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Sandra Turner