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10 Classes and Collective

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*)

**DECLARATION OF GENEVA KNIGHT**

19 Date: May 28, 2020

20 Time: 1:30 p.m.

21 Courtroom: 5 (17th Floor)

22 Judge: Honorable Edward M. Chen

23 *Jones* Complaint filed: April 21, 2017  
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26  
27  
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Attorneys for Plaintiffs and the Settlement Classes and Collective

DECLARATION OF GENEVA KNIGHT

1 I, Genea Knight, 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 September 2016 to March  
9 2017. I worked for CertifiedSafety as a Safety Attendant. In this role, I provided safety support and  
10 implemented safety protocols, including identifying, mitigating, and reporting potential safety  
11 hazards at CertifiedSafety's worksites. I worked for CertifiedSafety at oil refinery sites in  
12 California and Washington.

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 wanted to do something about these issues, and I also had other experiences during  
21 my work at CertifiedSafety that I wanted to talk to an attorney about. I decided to contact  
22 Schneider Wallace Cottrell Konecky LLP. They are my attorneys in this case.

23 8. I first reached out to Schneider Wallace Cottrell Konecky LLP to discuss my work  
24 experiences with Defendant in May 2017. I have been involved with these Actions ever since.

25 9. I became a Named Plaintiff in the *Jones* case when we filed the First Amended Class  
26 and Collective Action Complaint on June 26, 2017.

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1 10. Prior to filing the amended complaint, I had multiple telephonic interviews with my  
2 attorneys. Generally, we discussed my work experiences, the law, and the kinds of claims I could  
3 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. I understood that I would serve as the  
12 Named Plaintiff, the representative of a proposed class of workers, and the representative  
13 employee for claims under Washington law. I am the Class Representative for the Washington  
14 Rule 23 Class.

15 14. I worked with my attorneys to prepare the class and representative action complaint.  
16 I supplied information and documents to my attorneys to assist with the drafting process. I  
17 reviewed a draft of the complaint carefully and provided my attorneys with input.

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

20 16. We then entered the discovery phase of the case. I sat for my deposition on January  
21 15, 2018 in Emeryville, California. I traveled from my home in Palmdale in Southern California to  
22 Emeryville in the Bay Area to complete my deposition. I met with my attorneys for a full day to  
23 prepare for the deposition. When the deposition was complete, I reviewed the transcript closely.

24 17. I estimate that I devoted at least 22 hours of my time during the deposition process,  
25 including travel time, preparation time, the deposition itself, and reviewing the transcript.

26 18. Early in the case, I discussed alternative dispute resolution with my attorneys. We  
27 first mediated this dispute on January 23, 2018. I cleared my schedule and made myself available  
28 for the mediation, but the case did not settle at that time.

1           19.     I estimate that I spent approximately 3 hours on discussions with my attorneys  
2 regarding the first mediation.

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

6           21.     I extensively communicated with my attorneys regarding the results of the mediation  
7 and the essential terms of the Settlement that we reached.

8           22.     I estimate that I spent approximately 5 hours on discussions with my attorneys  
9 regarding the second mediation.

10          23.     After the proposed Stipulation of Class, Collective, and Representative Action (the  
11 “Settlement”) was reached, I carefully reviewed the terms. The Settlement is a lengthy document,  
12 and I reviewed it closely. I discussed it with my attorneys. I spent time evaluating the proposed  
13 outcome to assure that it was fair. Based on my own review and my attorneys’ evaluation and  
14 recommendation, I believe the Settlement is fair and reasonable. I signed the Settlement on  
15 November 20, 2019.

16          24.     I estimate that I spent at least 3 hours carefully reviewing the Settlement and  
17 discussing the terms with my attorneys.

18          25.     Throughout this action, I have been in regular communication with my attorneys to  
19 keep apprised of the status of the litigation. I have kept up-to-date on the status at every phase.  
20 Over the past three years, I estimate that I have spent 25 hours on phone calls and emails regarding  
21 status updates with my attorneys.

22          26.     In sum, I worked with my attorneys to prepare the complaint; sat for my deposition;  
23 spent hours assembling, discussing, and reviewing documents; participated actively in the  
24 mediation process and settlement decisions; and otherwise remained in constant contact with my  
25 attorneys. I have been involved with this litigation for over three years, and during that time I have  
26 contributed at least 75 hours of my own time to the prosecution of these claims.

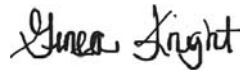
27          27.     By participating in this case as a Plaintiff, I placed myself at personal risk. For  
28 example, I faced: (a) risk to my reputation in my community as a result of stepping forward

1 publicly in a class action; (b) risk to my reputation as it concerns my future employment  
2 opportunities; (c) risk that I would be subject to intrusive discovery and time demands in this  
3 litigation; and (d) risk that I would have to pay defense costs if I lost this case.

4 28. Additionally, to make this Settlement a reality, I have agreed to a general release of  
5 all claims that I might have against CertifiedSafety. I believe that I may have non-wage and hour  
6 claims against CertifiedSafety. I have agreed to forego these claims.

7 29. I chose to face these risks to challenge the way that Defendant treated its employees.  
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9 I declare under penalty of perjury under the laws of the United States that the foregoing is  
10 true and correct. Executed on this 22nd day of April, 2020, in Palmdale, California.

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