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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 TIERRE CRUMMIE**

19  
20 Date: May 28, 2020  
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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Attorneys for Plaintiffs and the Settlement Classes and Collective

**DECLARATION OF TIERRE CRUMMIE**

I, **Tierre Crummie**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the case entitled *Crummie v. CertifiedSafety, Inc. et al.*, United States District Court for the Northern District of California, Case No. 3:17-cv-03892-EMC (the “*Crummie* Action”) which is consolidated to the case entitled *Jones v. CertifiedSafety, Inc., et al.*, United States District Court for the Northern District of California, Case No. 3:17-cv-02229-EMC. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Defendant CertifiedSafety, Inc. (“CertifiedSafety”) as an hourly-paid, non-exempt employee from approximately December 2015 to approximately February 2016 and from approximately May 2016 to approximately June 2016. I decided to seek legal advice about my work experiences at CertifiedSafety. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to take steps to make sure CertifiedSafety was held accountable for its practices and that it compensated its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 12 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 16 hours discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it means to commence a lawsuit as a named plaintiff and class representative and to eventually step into the shoes of the State of California as a PAGA representative.

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1           3.     Since becoming involved in this case, I have spent over 23 hours  
2 meeting with my attorneys regarding the case and fulfilling my responsibilities as a  
3 class and PAGA representative, which included gathering documents concerning  
4 my employment with CertifiedSafety, reviewing documents with my attorneys and  
5 answering their questions, answering questions and providing guidance regarding  
6 the duties of non-exempt employees, and helping develop a strategy as to what  
7 documents and information to obtain from CertifiedSafety. I routinely checked in  
8 with my attorneys and their staff to make sure that they had all of my most current  
9 information and any additional information that I had obtained from speaking with  
10 other employees.

11           4.     Throughout the case, I was available to answer any questions my  
12 attorneys had, and available to speak and meet with my attorneys whenever they  
13 needed me. I responded to them as quickly as possible and gave them as much  
14 information and identified as many documents as I could. I spent at least 22  
15 additional hours speaking with my attorneys about the case, identifying potential  
16 witnesses, providing my attorneys with documents and information concerning the  
17 case, and also describing policies, practices, and procedures of CertifiedSafety. In  
18 addition, I spent at least 4 hours discussing and providing responses to my  
19 attorneys in connection with Initial Disclosures.

20           5.     On September 20, 2018, I was deposed by CertifiedSaftey's counsel  
21 and my deposition lasted approximately 4 hours. I spent at least 6 hours preparing  
22 for the deposition and approximately 3.5 additional hours traveling to and from the  
23 deposition. After the deposition, I spent at least 8 hours reviewing my testimony  
24 and discussing the contents of the deposition transcript with my attorneys.

25           6.     As far as the settlement is concerned, I was available to review  
26 documents and answer any questions my attorneys had. I spent about 6 hours  
27 reviewing the settlement documents and about 4 hours asking questions and  
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1 discussing the potential settlement with my attorneys before signing the settlement  
2 agreement.

3 7. I believe that I have done everything that my attorneys have asked of  
4 me and have tried, to the best of my ability, to represent the class members and  
5 aggrieved employees, as well as the State of California. I think my efforts helped  
6 to get the result obtained in this case, and I respectfully request that the Court  
7 award me a service award in the amount of \$15,000.00 for my active participation  
8 in this case. Taking into consideration the time that I have dedicated to this case, I  
9 believe that this amount is reasonable.

10 8. I am not related to anyone associated with Lawyers *for* Justice, PC or  
11 Schneider Wallace Cottrell Konecky Wotkyns LLP.

12 9. I have not entered into any undisclosed agreements, nor have I  
13 received any undisclosed compensation in this case. The only compensation I will  
14 receive is whatever amount the Court awards as a service award, as well as my  
15 share of the settlement fund as a class member.

16 I declare under penalty of perjury under the laws of the State of California  
17 that the foregoing is true and correct.

18 Executed this 19 day of November 2019, at Bay Point, California.

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Tierre Crummie (Nov 19, 2019)

21 Tierre Crummie  
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