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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SONOMA

ARRON STANFIELD, as an individual
and on behalf of all others similarly
situated,

Plaintiffs,

vs.

THE F.A. BARTLETT TREE EXPERT
COMPANY, a Connecticut corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: SCV-265929

[Assigned for all purposes to the Honorable Patrick
M. Broderick, Dept. 16]

**DECLARATION OF ARRON STANFIELD IN
SUPPORT OF PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: May 26, 2021

Time: 3:00 p.m.

Dept.: 16

Complaint Filed: January 28, 2020

Trial Date: None Set

DECLARATION OF ARRON STANFIELD

I, Arron Stanfield, declare as follows:

1. I am an individual over the age of 18 years old and am a resident of California. I am the named Plaintiff in this matter. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I worked for The F.A. Bartlett Tree Expert Company ("Defendant") from about December 2017 to about November 11, 2019. Throughout my employment with Defendant, I was classified as an hourly, non-exempt employee.

3. During my employment with Defendant, I earned overtime wages. Whenever overtime wages were paid, my wage statement did not identify the overtime rate as 1.5 times my regular rate of pay. Instead, the overtime rate appeared as my base rate of pay.

4. During the pendency of this lawsuit, I was required to provide assistance to my attorneys, including meeting with them, providing them with documents and information, and reviewing pleadings in this case. I have been kept apprised of the status of this case.

5. I understand that the class claims alleged in this action were brought on behalf of other similarly situated employees, and thus I am acting as a representative for the Class. As the class representative, I understand that it is my responsibility to act in the Class's best interest and not my own. I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of any conflicts that exist between my interest and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

6. I have and continue to be willing to assist in the investigation of this matter as well as make myself available for trial or any further proceeding in this matter as required to represent the interests of the Class. I also understand my duties and responsibilities to the proposed class and will carry out those duties as necessary.

7. Based on my understanding of the case, I am of the opinion that settlement for the consideration and on the terms set forth in the Settlement Agreement are fair, reasonable, and adequate and is in the best interests of the Class.

8. I understood that filing this lawsuit is a public record and I accepted that burden.

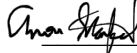
1 This lawsuit is something that potential employers can look into, and which may cause a
2 negative impact of my employment prospects. I also understood that there were risks due to my
3 involvement as a named plaintiff in a representative lawsuit against a large corporation. For
4 instance, if I lost, I might have to face a judgment for some of Defendant's legal costs. Even
5 understanding all these risks, I was willing to move forward and bring this case on behalf of the
6 other employees.

7 9. As part of the settlement, I also agreed to sign a general release of claims and a
8 waiver of Civil Code section 1542.

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

11 Executed on this ^{A S} day of April 2021, at Sonoma, California.

12 DocuSigned by:

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