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19 Attorneys for the Class

20 **UNITED STATES DISTRICT COURT**
21 **NORTHERN DISTRICT OF CALIFORNIA**

22 DENSON M. SALES; ANDRE
23 CLEMONS; ROBERT BEJAR; and
24 MARTIN CHAVEZ on behalf of
25 themselves, all others similarly situated,
26 and on behalf of the general public,

27 Plaintiff,

28 v.

UNITED ROAD SERVICES, INC.;
URS MIDWEST, INC. and DOES 1-
100, inclusive,

Defendants.

Case No. 4:19-cv-08404-JST

[Assigned to the Honorable Jon S. Tigar;
Department 6]

**DECLARATION OF KEVIN TAYLOR IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: October 5, 2023

Time: 2:00 p.m.

Complaint Filed: November 18, 2019

SAC Filed: May 18, 2023

Trial Date: May 20, 2024

1 I, KEVIN TAYLOR, declare the following:

- 2 1. All the facts set forth in this declaration are within my personal knowledge, true and
3 correct, and, if called upon to testify, I could and would competently and truthfully testify
4 to the following:
- 5 2. I have been an accountant and consultant for over 30 years. I am a Principal with Torrey
6 Partners, LLC. Torrey Partners is an expert services firm which provides independent
7 expert testimony and analysis, and strategic consulting services to clients including
8 corporations, major law firms, and local, state, and federal governments and agencies. The
9 firm employs certified public accountants, economists, information technology specialists,
10 and fraud investigation specialists, as well as others with advanced degrees in finance and
11 economics.
- 12 3. I hold a Bachelor of Science Degree in Accounting from Northeast Missouri State
13 University and a Masters in Business Administration from Arizona State University. I am
14 regularly engaged by my firm's business and litigation clients to examine data for the
15 purpose of converting, analyzing, and reporting such data and have been retained in
16 numerous class action matters involving analysis of large data sets and surveys. My
17 professional duties include discovery assistance for attorneys, causation analysis, damage
18 quantification analysis, and forensic accounting/fraud investigations involving varied
19 matters and industries. I have performed numerous analyses involving issues similar to
20 those in this matter on dozens of class action and wage/hour matters. Attached as **Exhibit**
21 **A** to this declaration is a true and correct copy of my current Curriculum Vitae, which sets
22 forth my education and experience.
- 23 4. I have been retained by Counsel for Plaintiffs in this matter to assist in evaluating the
24 potential damages in this case.
- 25 5. Once retained, I received and reviewed the following documents:
 - 26 a. An Excel file Bates labeled "URS001886;" and
 - 27 b. Defendant URS Midwest, Inc.'s Responses to Plaintiffs' Second Set of Requests
28 for Production of Documents.

1 6. URS Midwest, Inc.'s response to Request for Production Number 81 states that Bates
2 URS001886 itemizes costs Class Members had to incur as part of their contractual
3 obligation to URS Midwest, Inc.

4 7. Plaintiffs' Counsel asked me to tally these cost items found in Bates URS001886.

5 8. The cost items totaled \$82,073,415, which is broken down as follows:

- 6 a. \$21,587,775 was deducted for insurance;
- 7 b. \$52,327,151 was deducted for fuel expenses;
- 8 c. \$5,452,272 was deducted for repairs;
- 9 d. \$1,481,658 was deducted for damages; and
- 10 e. \$1,224,559 was deducted for operating expenses.

11 I hereby declare under penalty of perjury under the laws of the United States of America
12 that the foregoing is true and correct.

13
14 Date: 8/29/23

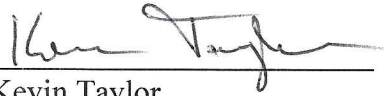
Signed: 
Kevin Taylor

EXHIBIT A

Kevin M. Taylor, MBA, CFE

Principal

Mr. Taylor is a Principal at Torrey Partners and is responsible for providing discovery assistance, data analysis, damage quantification analysis, and forensic accounting/fraud investigations on matters involving complex business, wage and hour, economic, bankruptcy, and marital dissolution issues.

Mr. Taylor's industry experience includes financial services, healthcare, insurance, government, professional services, manufacturing, environmental, construction, real estate, and small business.

In addition, Mr. Taylor develops custom software applications and data management solutions; and provides data development, recovery, conversion, management, integration, analysis and reporting services to clients.

PROFESSIONAL EXPERIENCE

2011 to present	Torrey Partners	Principal
2006 to 2011	LECG	Senior Managing Consultant
1999 to 2006	Mack Barclay Inc.	Director
1994 to 1999	Tucker Alan, Inc.	Principal
1990 to 1994	Peterson Consulting, L.P.	Senior Consultant
1986 to 1990	U-Haul International, Inc.	Accountant

EDUCATION

Master of Business Administration, Arizona State University, 1990

Bachelor of Science in Accounting, Northeast Missouri State University, 1986

Extended studies in computer technology

CERTIFICATIONS AND LICENSES

Certified Fraud Examiner

MEMBERSHIPS IN PROFESSIONAL ORGANIZATIONS

Association of Certified Fraud Examiners