

Brian J. Mankin, Esq. [CSB No. 216228]
brian@lmlfirm.com
Peter J. Carlson, Esq. [SBN 295611]
peter@lmlfirm.com
LAUBY, MANKIN & LAUBY LLP
5198 Arlington Avenue, PMB 513
Riverside, CA 92504
Tel: (951) 320-1444 | Fax: (951) 320-1445

Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

JOSEPH GREENDALE, individually, on a
representative basis, and on behalf of all
others similarly situated;

Plaintiff,

vs.

ANDERSEN DISTRIBUTION, INC., a
Delaware Corporation; ANDERSEN
LOGISTICS SACRAMENTO LLC, a
Minnesota Limited Liability Company;
ANDERSEN WINDOWS, INC., a Minnesota
Corporation; RENEWAL BY ANDERSEN,
LLC, a Minnesota Limited Liability
Company; and DOES 1 through 20, inclusive;

Defendants.

Case No.: CIVDS2016569
*[Assigned to Hon. Judge David Cohn, Dept
S26, for all purposes]*

**DECLARATION OF PLAINTIFF
JOSEPH GREENDALE IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Complaint filed: August 3, 2020

I, Joseph Greendale, state and declare:

1. I am the Plaintiff in the above captioned action and have personal knowledge of
all matters stated herein and can competently testify thereto. I make this declaration in support of
the motion for final approval of the class action settlement. I believe that the settlement is fair
and reasonable and constitutes a fair resolution of the claims alleged.

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1 2. During my employment with Andersen, there were several practices that I believe
2 violated California law. Therefore, I researched attorneys and contacted Lauby, Mankin & Lauby
3 LLP. Even after discussing these issues, I was unsure if I wanted to bring a lawsuit because of
4 the risk of stepping forward as a whistle blower, since this could jeopardize my livelihood in the
5 industry and make it difficult to find future jobs. Nevertheless, because I did not think that
6 myself or the other employees were being treated correctly, I retained Lauby, Mankin & Lauby
7 LLP to move forward with a case.

8 3. After retaining my attorneys, I understood that I had two options: I could pursue
9 my individual claims and attempt to maximize my personal recovery, or I could bring a
10 class/representative action and put the interests of the class ahead of my own. The decision of
11 whether to bring my individual claims or to bring a class action put me in a tough spot, because
12 on the one hand, I wanted to hold the company accountable for how they treated me and, on the
13 other hand, I wanted to help other employees that were not paid correctly. And I knew that, if I
14 wanted to bring a class action, I would need to put the interests of the class first to better serve
15 the class. In the end, in the interest of helping all employees that were subjected to the wage
16 violations, I decided to help everyone by bringing a class/representative action.

17 4. Since first initiating this action, I estimate that I have spent between 50 and 60
18 hours engaged in activities to benefit the class. I have assisted my attorneys in numerous ways,
19 including helping to oppose the motion to compel arbitration, and defeating that motion allowed
20 us to proceed on a class action basis to help everyone get money they were owed. I also helped
21 explain and discuss the company's practices and their general practices and procedures, locating
22 and analyzing company documents, and communicating with other class members. These efforts
23 occurred through numerous calls, emails, and text communications. I also assisted in preparation
24 for mediation and helped obtain a positive result for the class.

25 5. I respectfully request that the Court approve the agreed-upon service award. I
26 agreed to set aside my personal interests and to put the interests of the class ahead or on par with
27 my own. In doing so, and by successfully bringing this case as a class action, I helped to obtain a
28 highly beneficial settlement for the class members. I also believe that the service award is fair

1 and reasonable given that I have faced substantial risks and made numerous sacrifices to obtain
2 this class action settlement.

3 I declare under penalty of perjury under the laws of the State of California that the
4 foregoing is true and correct. Executed on June 6, 2023 at Ontario, California.

5
6 By:



Joseph Greendale (Jun 6, 2023 13:21 PDT)

Joseph Greendale