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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

ALONZO SMITH, Dawn Williams, and
ROMERO REYES, as individuals and on behalf
of all others similarly situated, and as private
attorneys general,

Plaintiffs,

vs.

CLEAN HARBORS ENVIRONMENTAL
SERVICES, INC., a Massachusetts corporation;
and DOES 1 through 50, inclusive,

Defendant.

Case No.: 34-2021-00292526

CLASS ACTION

**DECLARATION OF ROMERO REYES IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing Information

Date: March 10, 2023
Time: 9:00 a.m.
Dept: 28

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DECLARATION OF ROMERO REYES

I, Romero (Romeo) Reyes, declare:

1. I am over the age of 18 and am the one of the named Plaintiffs and class representatives in this matter. I have personal knowledge of the matters stated herein and if called and sworn as a witness, I would and could competently testify under oath thereto.

2. I worked for Clean Harbors Environmental Services, Inc. around 2015. As of this date, I am still employed at Clean Harbors Environmental Services, Inc. but I was placed on disability in April 2021.

3. I understand this is a class action lawsuit and I am representing the interests of Class. I understand that I must consider and protect the interests of the Class Members and place their interests before my own interests. I also understand that the court must approve any settlement to make sure I have protected the interests of the class members.

4. I have actively participated in this lawsuit by searching for an attorney since approximately August 2021 when I was searching for my attorney. I have helped and been willing to support the lawsuit in any way I can for the last approximately 18 months since August 2021 when I began searching for an attorney for the claims in this lawsuit. I have searched for an attorney, met with my attorneys to see if they would represent me, met with my attorneys to discuss the Defendant's policies, procedures, and practices for clocking in and out, paying wages for the hours that we worked, providing meal breaks, providing rest breaks, payment of premium wages, wage statements, and final payment of wages. I spent time searching for policies and procedures that were given to me during my employment, any timecards I had, any pay stubs I had, W2s, handbooks and other documents related to my employment. I produced all the documents to my attorneys. I responded to almost all of my attorneys' telephone calls and interviews and I met with them in person and/or telephonically to discuss any questions they had about my employment, Defendant's policies and procedures, Defendant's paying of minimum and overtime wages, Defendant's providing of meal and rest breaks, paying premium wages, providing wage statements, termination of employees, or the documents I had provided to them.

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1 5. As a named Plaintiff and class representative, I was also available during the
2 mediation session. After the mediation and the further negotiations that took place thereafter, I spoke
3 with my attorneys regarding the terms of the settlement which was reached between the parties and
4 understood that I was representing absent class members and therefore wanted the best possible
5 result to be obtained for the class and I believe a very positive result was in fact achieved via
6 settlement. After the mediation, I reviewed and signed a memorandum of understanding. Thereafter,
7 once the settlement agreement was finalized, I conferred with my attorneys on multiple occasions to
8 review and discuss the settlement agreement before signing. To date, I estimate I have spent at least
9 25 hours on this case.

10 1. Additionally, as part of the settlement it was necessary for me to sign a general release
11 of all claims I may have against the Clean Harbors. I believe the Class Representative Service
12 Payment I have requested provides me with some compensation for this agreed release.

13 1. I also understand that in the event this matter proceeds to trial, I must come to court
14 to participate in the trial. I will come to court if I am needed and have been ready to perform any
15 responsibility that is necessary for this lawsuit. I know that I took a risk by filing this lawsuit because
16 if I lost, I would have to pay for all the costs incurred by the Defendant in the lawsuit. I also have
17 the risk of losing income for any time that I would have to spend fulfilling my responsibilities
18 including having to attend the trial. I also believe I have taken a risk by filing this lawsuit because
19 my employers in the future may find out that I sued my employer, and they may not like it. The other
20 employees will be receiving money from this lawsuit and they have not had to file a lawsuit, look
21 for an attorney, or take the risks that I have had to take.

22
23 I declare under penalty of perjury, under the laws of State of California, that the foregoing is
24 true and correct.

25 Dated: 02-8-23


Romero (Romeo) Reyes