

**BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP**

Norman B. Blumenthal (State Bar #068687)  
Kyle R. Nordrehaug (State Bar #205975)  
Aparajit Bhowmik (State Bar #248066)  
Nicholas J. De Blouw (State Bar #280922)  
2255 Calle Clara La Jolla, CA 92037  
Telephone: (858)551-1223  
Facsimile: (858) 551-1232  
Website: [www.bamlawca.com](http://www.bamlawca.com)

Attorneys for Plaintiff Smith

*(Additional counsel on following page)*

**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,

Defendants.

Case No. 34-2021-00292526

[Hon. Lauri A. Damrell, Department 28]

**DECLARATION OF DAWN WILLIAMS IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT**

Date: March 10, 2023  
Time: 9:00 a.m.  
Department: 28  
Complaint Filed: January 14, 2021

**DIVERSITY LAW GROUP, P.C.**

Larry W. Lee (State Bar No. 228175)

[lwlee@diversitylaw.com](mailto:lwlee@diversitylaw.com)

Simon L. Yang (State Bar No. 260286)

[sly@diversitylaw.com](mailto:sly@diversitylaw.com)

515 South Figueroa Street, Suite 1250

Los Angeles, California 90071

Telephone: (213) 488-6555

Facsimile: (213) 488-6554

Attorneys for Plaintiff Williams

Joseph Lavi, Esq. (SBN 209776)

Vincent C. Granberry, Esq. (SBN 276483)

Melissa A. Huether, Esq. (SBN 316604)

**LAVI & EBRAHIMIAN, LLP**

8889 W. Olympic Blvd., Suite 200

Beverly Hills, California 90211

Telephone: (310) 432-0000

Facsimile: (310) 432-0001

Email: [jlavi@lelawfirm.com](mailto:jlavi@lelawfirm.com)

[vgranberry@lelawfirm.com](mailto:vgranberry@lelawfirm.com)

[mhuether@lelawfirm.com](mailto:mhuether@lelawfirm.com)

[whteam@lelawfirm.com](mailto:whteam@lelawfirm.com)

Sahag Majarian II, Esq. (State Bar No. 146621)

**Law Office of Sahag Majarian II**

E-Mail: [sahagii@aol.com](mailto:sahagii@aol.com)

18250 Ventura Boulevard

Tarzana, California 91356

Telephone: (818) 609-0807

Facsimile: (818) 609-0892

Attorneys for Plaintiff Reyes

1 I, Dawn Williams, declare as follows:

2 1. I am an individual over the age of 18. I am the named plaintiff in the above-reference  
3 action. I have personal knowledge of the facts set forth below, except as to those matters stated on  
4 information and belief and, as to those matters, I believe them to be true. If called as a witness, I could  
5 testify competently as to the matters stated in this declaration.

6 2. I began working for Clean Harbors Environmental Services, Inc. around April of 2017. I  
7 worked for the company until about April of 2020. Throughout my employment as a chemist, I was paid  
8 on an hourly basis as a non-exempt employee. During my employment, the company routinely refused  
9 to provide proper and timely off-duty meal and rest breaks. Rather, the company routinely denied me  
10 meal and rest breaks. Despite this, the company automatically deducted a half hour of work time from  
11 my worked hours each workday. I am informed and believe I would routinely work more than 8 hours  
12 per day or 40 hours per workweek, as reflected by actual time punch records. I am also informed and  
13 believe that whenever wages were paid, the company would shave off and not pay me for such overtime  
14 hours I worked. These wages were not paid upon the end of my employment. I am also informed and  
15 believe that I received inaccurate wage statements that, for example, failed to include the pay period  
16 start date or the applicable hourly rates of pay for wages earned.

17 3. During the pendency of this lawsuit, I have done my best to represent the interests of the  
18 employees that are part of the class. I have actively contributed to the litigation of this case. My  
19 contributions include but are not limited to (i) participating in numerous telephonic meetings with my  
20 attorneys and their staff to discuss the case and review documents prepared on my behalf, (ii) providing  
21 my attorneys with information and documents regarding my employment with Defendant, (iii) searching  
22 for additional information and documents requested by my attorneys, (iv) reviewing and approving the  
23 written notice to the Labor and Workforce Development Agency and the complaint and other papers  
24 filed with the court, (v) participating in mediated settlement discussions, (vi) reviewing and executing  
25 the settlement agreement, and (vii) reviewing and signing the declarations submitted to this Court in  
26 support of the settlement.

27 4. I understand that the class claims alleged in this action were brought on behalf of other  
28 similarly situated employees, and thus I am acting as a representative for the Class. I understood that an

1 individual case would have resolved much faster than a class action and involved much less financial  
2 risk than a class action.

3 5. Throughout the lawsuit, I have been kept apprised of the status of this case. As the class  
4 representative, I understand that it is my responsibility to act in the Class's best interest and not my own.  
5 I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of any  
6 conflicts that exist between my interest and the interests of the Class that would impair or affect my  
7 ability to serve as representative for the Class.

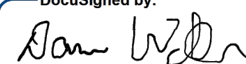
8 6. I have and continue to be willing to assist in the investigation of this matter as well as  
9 make myself available for trial or any further proceeding in this matter as required to represent the  
10 interests of the Class. I also understand my duties and responsibilities to the proposed class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

12 7. I have discussed the terms of the settlement agreement with my attorneys, and based on  
13 my understanding of the case, I am of the opinion that settlement for the consideration and on the terms  
14 set forth in the settlement agreement are fair, reasonable, and adequate, and in the best interests of the  
15 Class.

16 8. I understood that filing this lawsuit is a public record and I accepted that burden. This  
17 lawsuit is something that potential employers can look into, and which may cause a negative impact of  
18 my employment prospects. I also understood that there were risks due to my involvement as a named  
19 plaintiff in a representative lawsuit against a large employer. For instance, if I lost, I might have to face a  
20 judgment for some of Defendant's legal costs. Even understanding all these risks, I was willing to move  
21 forward and bring this case on behalf of the other employees.

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

24 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
25 true and correct. Executed this 10<sup>th</sup> day of February 2023, at Fairfield, California.

26 DocuSigned by:  
  
F9EDFA0390D84CE...

27 Dawn Williams  
28