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8 CHRIS MARCUS CALKINS, and all others similarly situated

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF LOS ANGELES**

11 **(UNLIMITED JURISDICTION)**

12
13 CARISSA CALKINS, on behalf of herself, all
14 others similarly situated, the general public, and
15 as an “aggrieved employee” on behalf of other
“aggrieved employees” under the Labor Code
Private Attorneys General Act of 2004,

16 *Plaintiff(s),*

17 vs.

18
19 UNITED SECURITY SERVICES, INC., an
20 Illinois corporation; and DOES 1–50, inclusive,

21 *Defendant(s).*

Case No. 20STCV35391

**DECLARATION OF CHRIS
MARCUS CALKINS NÉE CARISSA
CALKINS IN SUPPORT OF
PLAINTIFF’S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Date: December 9, 2024
Hearing Time: 10:00 a.m.
Hearing Dept.: SSC-7, The Honorable
Lawrence P. Riff

Action filed: September 16, 2020



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1 **DECLARATION OF CHRIS MARCUS CALKINS IN SUPPORT OF MOTION FOR**
2 **PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

3 I, CHRIS MARCUS CALKINS née Carissa Calkins, and state as follows:

4 1. I am a resident of the City of Long Beach, in the State of California and am over
5 18 years of age. I am the plaintiff in this action and am represented by David Spivak of The Spivak
6 Law Firm and Walter L. Haines of United Employees Law Group in this action. Except as
7 otherwise stated, I have personal knowledge of all matters set forth in this declaration and could
8 and would competently testify thereto if called upon to do so as a witness.

9 2. I understand that, as Class Representative, I have certain duties and responsibilities
10 to the Class Member and believe that I have fairly represented the interests of all Class Member
11 during the entire course of this case.

12 3. My counsel provided me with information regarding class actions, how they work,
13 and what my duties would be as the Class Representative. I agreed to serve as a Class
14 Representative so that I could seek to recover wages and penalties on behalf of myself and other
15 employees like me.

16 4. I understand that the Settlement in this case is subject to this Court's approval to
17 ensure that it is in the best interest of the Class as a whole. I have no conflicts with the Class.

18 5. I understand that my attorneys are submitting an application to this Court for a
19 Class Representative Service Payment to compensate me for my unique contributions to the
20 success of this action as the Class Representative in the amount of \$15,000.00. I believe this
21 amount is fair and reasonable compensation for my efforts in this case and the risks I have taken
22 in pursuing a fair recovery for the Class Member.

23 6. I have provided Defendant with a general release of any and all claims, known or
24 unknown, I may have against Defendant. By agreeing to settle the case in the best interest of the
25 Class Member, I have given up the right to pursue my individual claims for unpaid wages and
26 penalties and to recover substantially more for unpaid wages, interest, waiting time penalties, and
27 pay stub penalties. I did not seek an individual settlement for my claims at all, instead choosing
28 to prosecute this matter on behalf of my coworkers. By pursuing the claims of all Class Member,



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1 I have also rendered my own individual payment uncertain and delayed its payment by several
2 months (at the least).

3 7. As Class Representative, I assumed a fiduciary role to the Class. I agreed to (1)
4 consider the interests of the Class just as I would consider my own interests and, in some cases,
5 to put the interests of the Class before my own interests; (2) actively participate in the lawsuit, as
6 necessary, by among other things, producing documents to Defendant and giving depositions and
7 trial testimony if requested; (3) travel to give such testimony if requested; (4) recognize and accept
8 that any resolution of the lawsuit by dismissal or settlement, is subject to court approval, and must
9 be designed in the best interest of the Class as a whole; (5) follow the progress of the lawsuit and
10 provide all relevant facts to my attorneys; (6) champion many other people with similar claims
11 and injuries because of the importance of the case and the necessity that all Class Member benefit
12 from the lawsuit; and (7) fight for a resolution in which the individual recoveries to each Class
13 Members, including me, maybe relatively small. I agreed to shoulder all of these responsibilities
14 in exchange for a proportionate share of funds made available for distribution to the Class
15 Member. I had no guarantee of a Class Representative Service Payment. The activities I have
16 performed have included, but have not been limited to: obtaining legal counsel, speaking with my
17 legal counsel on numerous occasions, over the phone, informing them of the terms and conditions
18 of my coworkers' employment, assisting them in gathering information, identifying the claims
19 brought in this case, gathering contact information for my former coworkers, contacting Class
20 Member about the lawsuit to arrange their communications with my attorneys, gathering
21 documents from my employment with Defendant, and being actively involved in the settlement
22 process to ensure a fair result for the Class as a whole. I also participated in the mediation and
23 spent time carefully reviewing the Settlement, and other case related documents on my own and
24 with my counsel to make sure that the Settlement and other work my attorneys performed are in
25 the best interest of the Class Member.

26 8. Further, my counsel have advised me of the possibility that, if the case was lost, I
27 could have been ordered to pay Defendant's costs and even attorneys' fees in this case, which
28 could have been thousands of dollars by the end.



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1 9. Because I filed this lawsuit, there is a public record at the Court showing that I
2 brought a class action for unpaid wages against my former employer. The Class Representative
3 Service Payment to me of \$15,000.00 is not equal to the harm to my future career prospects that
4 this case may cause me.

5 10. Based on the time, risk, stigma, loss of benefits and income and great outcome of
6 this case, I believe that the requested Class Representative Service Payment for me is fair and
7 reasonable. As such, I respectfully request that the Court award the requested Class
8 Representative Service Payment of \$15,000.00.

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

11 Executed on 10 / 29 / 2024 in Long Beach, California.

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14 CHRIS MARCUS CALKINS,
15 Declarant
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