

1 Manny M. Starr (SBN 319778)
2 manny@frontierlawcenter.com
3 Daniel V. Ginzburg (SBN 327338)
4 dan@frontierlawcenter.com
5 FRONTIER LAW CENTER
6 23901 Calabasas Road, #2074
7 Calabasas, CA 91302
8 Telephone: (818) 914-3433
9 Facsimile: (818) 914-3433

10 Attorneys for Plaintiff
11 Carrell Bilyeu

12 SUPERIOR COURT OF CALIFORNIA
13 COUNTY OF AMADOR

14 CARRELL BILL BILYEU, an individual,

15 Plaintiff,

16 v.

17 U.S. MINE CORP, a Nevada Corporation;
18 and DOES 1 to 50, inclusive,

19 Defendants.

) CASE NO. 20-CV-11946

)
) **DECLARATION OF CARRELL**
) **BILYEU IN SUPPORT OF**
) **APPLICATION FOR APPROVAL OF**
) **PAGA SETTLEMENT**

) Assigned to Hon. J.S. Hermanson
) *Action Filed: December 23, 2020*
)
)
)

20 I, CARRELL BILYEU, declare under penalty of perjury as follows:

21 1. I am the Plaintiff in this action.

22 2. I have personal knowledge of the facts set forth below and if called to testify I could
23 and would do so competently.

24 3. I was formerly employed by Defendant U.S. Mine Corp as a heavy haul truck
25 operator at their pit mining operation from October 1, 2019, through October 2021

26 4. While employed by Defendant, I was not paid for all hours worked, not provided
27 with compliant meal breaks, not reimbursed for all work-related expenses, provided with inaccurate
28 wage statements, not paid all wages due at the conclusion of my employment, was subjected to

6. I am aware and have been aware from the inception of the case, that there is the risk that if I do not win, then I could be liable for the Defendant's costs. I accepted that risk in this case.

8. I believe that the settlement is fair, adequate, and reasonable for the Aggrieved Employees and the State of California. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive accomplishment and understand that other Aggrieved Employees and the State of California will benefit because of the actions that I have taken.

10. Based on the above, I reiterate my full support for the entirety of the settlement and request that the Court enter an order approving this settlement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 01/04/22 | 5:01 PST in California.

—DocuSigned by:

Carrell Bill Bilyeu

464FE90287B9434
CARRELL BILYEU