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Attorneys for Plaintiff Pamela Williams, on behalf of herself and all “aggrieved employees” pursuant to Labor Code § 2698 *et seq.*

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

PAMELA WILLIAMS, on behalf of herself
and all “aggrieved employees” pursuant to
Labor Code § 2698 *et seq.*,

Plaintiff,

v.

STONEMOR, INC., a Delaware corporation,
and DOES 1 through 10, inclusive,

Defendants.

CASE NO: 20-CIV-05216

*Assigned to the Hon. V. Raymond Swope,
Dept. 23, Courtroom 8A*

**DECLARATION OF PAMELA
WILLIAMS IN SUPPORT OF
UNOPPOSED MOTION FOR AN ORDER
APPROVING SETTLEMENT OF
CLAIMS BROUGHT PURSUANT TO
THE PRIVATE ATTORNEYS GENERAL
ACT OF 2004, AWARDING
ATTORNEYS’ FEES, COSTS,
ENHANCEMENT AND GENERAL
RELEASE PAYMENT, AND
REIMBURSEMENT OF SETTLEMENT
ADMINISTRATION EXPENSES, AND
DISMISSING ACTION WITH
PREJUDICE**

Date: April 8, 2024

Time: 3:00 P.M.

Dept.: 23

Courtroom: 8A

Complaint Filed: November 24, 2020

FAC Filed: January 5, 2021

Trial Date: None

1 I, PAMELA WILLIAMS, hereby declare and state as follows:

2 1. I am a named Plaintiff in this lawsuit against Defendant STONEMOR GP,
3 LLC (sued as STONEMOR, INC.) (“Defendant”) and I submit this declaration in support
4 of Plaintiff’s Unopposed Motion For An Order Approving Settlement Of Claims Brought
5 Pursuant To The Private Attorneys General Act Of 2004, Awarding Attorneys’ Fees,
6 Costs, Enhancement and General Release Payment, And Reimbursement Of Settlement
7 Administration Expenses, And Dismissing Action with Prejudice. I am a competent adult
8 and worked for Defendant as a non-exempt employee between October 2019 and April
9 2020. I have personal knowledge of the facts set forth herein, and if called as a witness
10 to testify to them, I could and would do so competently.

11 2. I contacted my current attorneys when I questioned the employment
12 practices of Defendant prior to commencing this lawsuit. I accepted the opportunity to
13 act as a representative on behalf of other employees of Defendant in this action whom I
14 believed were being subjected to labor law violations. I pursued this case on a
15 representative basis so that I could help other employees recover for what I believed were
16 Defendant’s improper practices.

17 3. Specifically, I questioned Defendant’s policies of failing to pay all wages
18 due, to provide legally compliant meal and rest periods, or compensation in lieu thereof,
19 to reimburse for all business expenses incurred, to issue accurately itemized wage
20 statements, and to timely pay all wages due at the separation of employment. Through
21 many discussions with my lawyers, I learned these may be illegal practices and
22 Defendant’s employees might have recourse for them.

23 4. By bringing this lawsuit, and throughout its course, I have put the interests
24 of other employees ahead of my own. I understood that I could possibly earn an incentive
25 award if this case resolved itself favorably, but I also knew that I could also be responsible
26 for paying Defendant’s attorneys’ fees and costs if it did not.

1 5. My goal in bringing this lawsuit was to obtain a recovery on behalf of all
2 employees of Defendant, and even more importantly, to put an end to what I believed
3 were illegal practices on the part of Defendant. I believe I have achieved both through
4 this lawsuit and settlement.

5 6. I am very happy about the results of this litigation. I am satisfied that
6 Defendant is compensating other Aggrieved Employees and the State for penalties that I
7 believe we are due.

8 7. At the onset of this case, I spent time through numerous phone calls with
9 several of my attorneys explaining what I understood to be Defendant's policies and
10 practices and how they were applied to other employees. I kept actively involved with the
11 status of this case throughout the litigation process, tracking the status of the case and
12 participating as much as possible.

13 8. While I have not maintained detailed time records of my activities in
14 connection with this litigation, I believe that I have spent a total of approximately 30 hours
15 assisting my attorneys with the preparation of this case and doing work and investigation
16 of the facts independent from my attorneys both before and during this case.

17 9. Before this litigation commenced, and throughout its course, I spent
18 approximately 3-4 hours gathering, organizing, and reviewing documents and information
19 for this lawsuit. I sifted through many of my own documents and reviewed information
20 produced by Defendant as part of this litigation.

21 10. I communicated with my attorneys several times per month to track my
22 case's status. I have taken an active involvement in this matter throughout its course.

23 11. Taking the initiative with this case was very risky for me, both
24 professionally and financially. I put principal first and took a tremendous risk by filing
25 this lawsuit. I am quite confident that pursuing this lawsuit will result in future
26 reputational harm to me. There is a stigma associated with suing one's former employer.
27 I suspect I may be adversely affected when it comes to obtaining future employment –
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1 employers who discover that I sued Defendant in a representative action will likely avoid
2 hiring me.

3 I declare, under penalty of perjury, under the laws of the State of California that the
4 foregoing is true and correct.

5 Executed on 01 / 31 / 2024 at Alameda, California.

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7 *Pam Williams*
8 PAMELA WILLIAMS

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