

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

Attorneys for Plaintiff and the Class

(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
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: November 4, 2022
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

Simon L. Yang (State Bar No. 260286)

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

vgranberry@lelawfirm.com

mhuether@lelawfirm.com

whteam@lelawfirm.com

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

Law Office of Sahag Majarian II

E-Mail: 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:

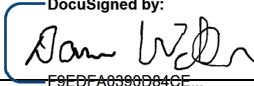
2 1. I am an individual over the age of 18. I am the named plaintiff in the above-reference
3 action. I have personal knowledge of the facts set forth below, except as to those matters stated on
4 information and belief and, as to those matters, I believe them to be true. If called as a witness, I could
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. I have taken all necessary steps to represent the interests of the Class, including by
18 providing information and documents to my counsel, discussing the claims and lawsuit with my counsel,
19 and answering any questions that have come up, including about how I was paid or what my wage
20 statements show or meant. I understand that I am responsible to the Class with respect to trying the case,
21 appearing in court, and working with Class Counsel. I am willing to act as a fiduciary for the Class. I
22 remain willing to devote my time to this lawsuit for the benefit of the Class. I do not believe I have any
23 interests that are adverse to the interests of the Class. I also am unaware of any such issues having been
24 raised or presented by anyone else.

25 4. I believe many employees would not sue their employer out of fear. I took on risks by
26 bringing this lawsuit, and I understand that other people will benefit because of the actions that I have
27 taken. I feel that it is a positive accomplishment, am proud of the result, and believe that the class
28 settlement is fair, adequate, and reasonable.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct. Executed this 12th day of October 2022, at Fairfield, California.

3 DocuSigned by:
4 
5 F9EDFA0390D04CE...
6 Dawn Williams