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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

HEATHER BOONE and ROXANNE
RIVERA, on behalf of themselves and all
others similarly situated,

Plaintiffs,

CRISTIAN BARRERA, individually,

Plaintiff,

v.

AMAZON.COM SERVICES, LLC,

Defendant.

Case No. 1:21-CV-00241-NODJ-BAM – LEAD
Case No. 1:22-CV-00146-NODJ-BAM-MEMBER

**DECLARATION OF HEATHER BOONE IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

DECLARATION OF HEATHER BOONE

I, Heather Boone, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1 1. I have personal knowledge of the following facts and if called as a witness, I could
2 and would testify competently.

3 2. I am a former employee of Amazon. Specifically, I worked for Amazon as an hourly,
4 non-exempt employee at the Amazon facility in Fresno, California. My position was fulfillment
5 center associate. My job duties included gathering packages from the Amazon warehouse, scanning
6 them, placing them in boxes, and labelling the items. I worked for Amazon from approximately
7 June 2018 to July 2020.

8 3. Following the outbreak of the COVID-19 pandemic, Amazon instituted a company-
9 wide policy requiring its hourly, non-exempt employees at its fulfillment centers and distributions
10 centers to undergo a COVID-19 screening prior to the start of their scheduled shifts. These screenings
11 were required by Amazon, were conducted on the premises of Amazon, and were controlled by
12 Amazon. Unfortunately, Amazon did not automatically pay for the time spent by its employees
13 completing the COVID-19 screenings and employees, like me, were not paid for all of the time spent
14 completing the COVID-19 screenings.

15 4. Accordingly, on February 23, 2021, this lawsuit was filed against Amazon. I am a
16 named plaintiff in this action and I am represented by the law firms of Hodges & Foty, LLP and
17 Parmet PC. Since the beginning, I have actively participated in this case during the past three years
18 years by assisting the attorneys and their staff in the investigation and information gathering
19 associated with this action. Since I have been a named plaintiff, I have understood that it was my duty
20 to serve the interests of all the workers involved in this lawsuit and not just my own interests. My
21 attorneys explained this to me. I have had no conflicts of interests that have interfered with my duty
22 to serve the entire class.

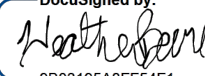
23 5. I know that Amazon is one of the largest companies in the nation. However, this
24 lawsuit was to help Amazon workers recover their unpaid wages. I understand the role of a class
25 representative is important and I chose to take on that role to make a positive impact beyond my
26 own claims and interests, in order to assist and aid the Class Members who may not have brought
27
28

claims on their own. I knew and understand that I would be required to hold the Class Members' interests in equal, if not higher, regard than my own.

6. I believe the settlement is fair and reasonable in light of the circumstances. I have had discussions with my lawyers about the settlement, and I have reviewed the settlement papers with them. I believe that the settlement is in the best interest of the Class Members.

I declare under penalty of perjury that the foregoing is true and correct.

Dated 9/23/2024.

DocuSigned by:

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HEATHER BOONE