

MATTHEW S. PARMET, SBN 296742

matt@parmet.law

PARMET PC

340 S. Lemon Ave., #1228

Walnut, CA 91789

Telephone: 713.999.5228

Facsimile: 713.999.1187

Local Counsel for Plaintiffs Boone and Rivera

*DON J. FOTY

dfoty@hfttrialfirm.com

*DAVID W. HODGES

dhodges@hfttrialfirm.com

HODGES & FOTY, LLP

2 Greenway Plaza, Suite 250

Houston, TX 77046

Telephone: 713.523.0001

Facsimile: 713.523.1116

Attorneys for Plaintiffs Boone and Rivera

MICHAEL NOURMAND, SBN 198439

mnourmand@nourmandlawfirm.com

JAMES A. DE SARIO, SBN 262552

jdesario@nourmandlawfirm.com

THE NOURMAND LAW FIRM, APC

8822 West Olympic Boulevard

Beverly Hills, CA 90211

Telephone: 310.553.3600

Facsimile: 310.553.3603

Attorneys for Plaintiff Barrera

* Admitted pro hac vice

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 ROXANNE RIVERA
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

DECLARATION OF ROXANNE RIVERA

I, Roxanne Rivera, 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 current employee of Amazon. I have worked for Amazon as an hourly, non-
4 exempt employee. I first started working at the Amazon facility in Patterson, California and I
5 currently work for the Amazon facility in Tracy, California. My position is fulfillment center
6 associate. My job duties at the Tracy location include gathering items from the shelves in the
7 warehouses and putting the items in carts. At the Patterson location, my job duties included gathering
8 items and placing them in the right location in the warehouse. I have worked for Amazon since
9 November 2018.

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

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

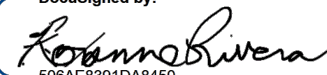
25 5. I know that Amazon is one of the largest companies in the nation. However, this
26 lawsuit was to help Amazon workers recover their unpaid wages. I understand the role of a class
27 representative is important and I chose to take on that role to make a positive impact beyond my
28

own claims and interests, in order to assist and aid the Class Members who may not have brought 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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ROXANNE RIVERA