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Attorneys for Plaintiff TRICILLA GRIFFIN

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

TRICILLA GRIFFIN, individually,
and on behalf of other members of the
general public similarly situated and
on behalf of other aggrieved
employees pursuant to the California
Private Attorneys General Act;

Plaintiff,

vs.

CONSOLIDATED
COMMUNICATIONS, an unknown
business entity; and DOES 1 through
100, inclusive,

Defendant.

Case No.: 2:18-cv-00885-WBS-KJN

Honorable William B. Shubb

**DECLARATION OF TRICILLA
GRIFFIN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
and PAGA Settlement; Declaration of
Proposed Class Counsel (Ovsanna
Takvoryan); and [Proposed] Order
filed concurrently herewith]

Date: October 31, 2022
Time: 1:30 P.M.
Courtroom: 5

Complaint Filed: February 24, 2021
FAC Filed: April 26, 2021
Jury Trial Date: None Set

DECLARATION OF TRICILLA GRIFFIN

I, Tricilla Griffin, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Consolidated Communications (“Defendant”) in an hourly-paid position as a Collections Representative/Biller from approximately June 2018 to approximately September 2019. I decided to seek legal advice about my work experiences with Defendant. I contacted Lawyers *for* Justice, PC and spoke with attorneys there, including Arby Aiwarzian. I wanted to do whatever I could to make sure that Defendant was held accountable for not paying its hourly-paid or non-exempt employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 10 hours. Afterwards, I consulted with the attorneys at Lawyers *for* Justice, PC for 9 hours discussing my situation, complex wage-and-hour class actions and, representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to commence the lawsuit and be a named plaintiff, class representative, and eventually PAGA representative.

3. I have spent over 15 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make

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1 sure they had all of my most current information and any additional information
2 that I had obtained.

3 4. I was available to answer any questions my attorneys had, and
4 available to speak and meet with my attorneys whenever they needed me. I
5 responded to them as quickly as possible and gave them as much information and
6 identified as many documents as I could. I spent at least 9 additional hours
7 speaking with my attorneys about the case, identifying potential witnesses,
8 providing my attorneys with documents and information concerning the case, and
9 also describing policies, practices, and procedures of Defendant.

10 5. As far as the settlement is concerned, I was available to review
11 documents and answer any questions my attorneys had. I spent about 4 hours
12 reviewing the settlement documents and about 3 hours asking questions and
13 discussing the settlement with my attorneys before signing the settlement
14 agreement.

15 6. I believe that I have done everything that my attorneys have asked of
16 me and have tried, to the best of my ability, to represent the class and seek relief
17 for the aggrieved employees and the State of California. I think my efforts have
18 helped to obtain the result in this case, and as a class and PAGA representative, I
19 respectfully request that the Court award me an enhancement payment in the
20 amount of \$7,500.00 for my active participation in this case. Taking into
21 consideration the time that I have dedicated to this case, I believe that this amount
22 is reasonable.

23 7. I am not related to anyone associated with Lawyers *for* Justice, PC.

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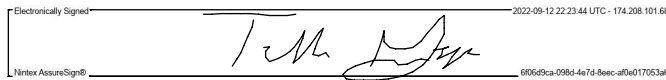
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1 8. I have not entered into any undisclosed agreements, nor have I
2 received any undisclosed compensation in this case. The only compensation I will
3 receive is whatever amount the Court awards as an enhancement payment, as well
4 as my share of the settlement as a class member and as an aggrieved employee.

5 I declare under penalty of perjury under the laws of the State of California
6 that the foregoing is true and correct.

7 Executed this ^{09/12/2022} ____ day of September 2022, at Antelope, California.

8
9  Electronically Signed: 2022-09-12 22:23:44 UTC - 174.208.101.68
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