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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

**CASCADE DRILLING WAGE AND HOUR
CASES**

List of Actions:

Martinez, et al. v. Cascade Drilling LP,
Alameda Case No. RG21090743

Lilla v. Cascade Drilling, LP, Contra Costa
Case No. C211568

Case No: RG21090743

ASSIGNED FOR ALL PURPOSES TO
JUDGE STEPHEN KAUS, DEPARTMENT 19

**DECLARATION OF ROBERT SPENCER
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT AND MOTION FOR
AWARD OF ATTORNEYS' FEES AND
COSTS, CLASS REPRESENTATIVE
ENHANCEMENTS, AND SETTLEMENT
ADMINISTRATION FEES**

Date: June 26, 2023
Time: 3:00 p.m.
Dept. 19
Judge: The Hon. Stephen Kaus

Complaint Filed: April 9, 2021
FAC Filed: May 18, 2021

**Reservation No: A21090743-001
Reservation No: A21090743-002**

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25 Attorneys for Plaintiff

26 JOHN LILLA

1 I, ROBERT SPENCER, declare as follows:

2 1. I am an attorney duly admitted to the practice of law in the State of California. I
3 am an associate with the law firm Keller Grover LLP, co-counsel for Plaintiffs Eugene Martinez
4 and Robert Williams (“Plaintiffs”), and co-Class Counsel in this action. I have personal
5 knowledge of the facts stated herein and, if called as a witness, I could and would testify
6 competently to the facts set forth below.

7 2. On June 1, 2023, I personally uploaded the following documents to the LWDA
8 website: 1) Plaintiffs’ Notice of Motion and Motion for Final Approval of Class and PAGA
9 Action Settlement and Memorandum of Points and Authorities in Support Thereof, 2) Plaintiffs’
10 Notice of Motion and Motion for Award of Reasonable Attorneys’ Fees and Costs, Class
11 Representative Enhancements, and Settlement Administration Fees, Memorandum of Points and
12 Authorities in Support Thereof, 3) Declaration of Eric A. Grover in Support of Motion for Final
13 Approval of Class and PAGA Action Settlement and Motion for Award of Reasonable
14 Attorneys’ Fees and Costs, Class Representative Enhancements, and Settlement Administration
15 Fees, 4) Declaration of Edwin Aiwazian in Support of Motion for Final Approval of Class
16 Action and Private Attorney General Act Settlement and Motion for Attorneys’ Fees and Costs,
17 5) Declaration of Raul Perez in Support of Motion for Final Approval of Class Action Settlement
18 and Motion for Attorneys’ Fees, Costs and Expenses, and Class Representative Enhancements,
19 6) Declaration of Eric Springer Regarding Notice and Settlement Administration, 7) Declaration
20 of Plaintiff Eugene Martinez in Support of Motion for Final Approval of Class and PAGA
21 Action Settlement and Motion for Award of Attorneys’ Fees and Costs, Class Representative
22 Enhancements, and Settlement Administration Fees, 8) Declaration of Plaintiff Robert Williams
23 in Support of Motion for Final Approval of Class and PAGA Action Settlement and Motion for
24 Award of Attorneys’ Fees and Costs, Class Representative Enhancements, and Settlement
25 Administration Fees, 9) Declaration of Plaintiff Jonathan Lilla in Support of Motion for Final
26 Approval of Class and PAGA Action Settlement and Motion for Award of Attorneys’ Fees and
27 Costs, Class Representative Enhancements, and Settlement Administration Fees, 10) the
28

1 proposed order, 11) this declaration, and 12) the Stipulation of Class Action and Private
2 Attorney General Act Settlement and Release.

3 I declare under penalty of perjury under the laws of the State of California that the
4 foregoing is true and correct, and that this Declaration was executed on this 1st day of June 2023
5 at San Francisco, California.

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7 ROBERT SPENCER
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PROOF OF SERVICE

I, JOEY GONZALEZ, am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1965 Market Street, San Francisco, California 94103. On **June 1, 2023**, in the case of *Cascade Drilling Wage and Hour Cases*, Alameda County Superior Court, case number RG21090743, I served the foregoing document(s):

DECLARATION OF ROBERT SPENCER IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT AND MOTION FOR AWARD OF ATTORNEYS' FEES AND COSTS, CLASS REPRESENTATIVE ENHANCEMENTS, AND SETTLEMENT ADMINISTRATION FEES

on the interested party(ies) below, using the following means:

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☒	(BY ELECTRONIC SERVICE) by electronically mailing a true and correct copy in PDF format through our electronic mail system to the email address(es) set forth above, or as stated on the attached service list per agreement between the parties.
☒	(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.


JOEY GONZALEZ