

Edwin Aiwarzian (SBN 232943)
Arby Aiwarzian (SBN 269827)
Joanna Ghosh (SBN 272479)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff John Lilla and the Class

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

Coordination Proceeding Special Title
(California Rules of Court, Rule 3.550)

**CASCADE DRILLING WAGE AND
HOUR CASES**

Included Actions:

*Eugene Martinez, et al. v. Cascade Drilling,
LP*, Alameda County Superior Court Case
No. RG21090743

John Lilla v. Cascade Drilling, LP, Contra
Costa County Superior Court Case No.
MSC21-01568

Case No.: RG21090743

Honorable Stephen Kaus
Department 19

CLASS ACTION

**DECLARATION OF JOHN LILLA IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Reservation No.:	A-21090743-001
Reservation No.:	A-21090743-002
Date:	June 26, 2023
Time:	3:00 p.m.
Department:	19

DECLARATION OF JOHN LILLA

I, **John Lilla**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the action entitled *John Lilla v. Cascade Drilling, LP*, Contra Costa County Superior Court Case No. C21-01568, which is an included action in the above-captioned coordination proceeding. 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 Cascade Drilling, L.P., ("Cascade") as an hourly-paid, non-exempt employee from approximately December 2016 to approximately December 2019. I decided to seek legal advice about my work experiences with Cascade and about filing a lawsuit to seek to redress my grievances. I contacted Lawyers for Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Cascade paid me and other employees what was owed to us and stopped its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated complex wage-and-hour and class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately **8 hours**. Thereafter, I consulted with attorneys at Lawyers for Justice, PC for approximately **7 hours** discussing my situation, complex wage-and-hour class actions in general, and what it meant to be a named plaintiff and class representative.

3. I have spent over **21 hours** communicating with my attorneys regarding the matter and fulfilling my responsibilities as a class representative, which included gathering documents and providing documents concerning my employment with Cascade, reviewing documents with my attorneys and answering their questions, providing information regarding the duties of non-exempt, hourly-paid employees, and helping develop a strategy as to what documents and information to obtain from Cascade. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and to provide them with any additional information that I had obtained.

///

4. Throughout the matter, I was available to answer any questions my attorneys had, and available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **16 additional hours** speaking with my attorneys about the matter, identifying potential witnesses, providing my attorneys with documents and information concerning the matter, and also describing policies, practices, and procedures of Cascade.

5. I spent about **3 hours** reviewing the settlement papers and about **2 hours** asking questions and discussing the potential settlement with my attorneys, before signing the settlement agreement.

6. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to represent and seek relief for the class. I think my efforts helped to get the result obtained in this matter.

7. I respectfully request that the Court award me a class representative enhancement payment in the amount of \$10,000.00 for my active participation in this matter. Taking into consideration the time that I have dedicated to this matter, I believe that this amount is reasonable.

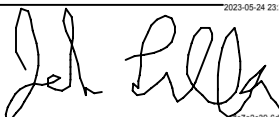
8. I am not related to anyone associated with Lawyers *for* Justice, PC, Keller Grover LLP, or Capstone Law APC.

9. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this matter. The only compensation I will receive is whatever amount the Court awards as a class representative enhancement payment, as well as my share of the settlement as a class member.

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

05/24/2023

Executed this ____ day of May 2023, at El Sobrante, California.

Electronically Signed 2023-05-24 23:28:44 UTC - 174.194.196.251

Nintex AssureSign® 767a2c39-6d4b-4568-a517-b000d157c254

John Lilla

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 JOHN LILLA IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

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

KONING ZOLLAR LLP

Blake Zollar

blake@kzllp.com

Shaun Paisley

shaun@kzllp.com

Neal Gibeault

neal@kzllp.com

Attorneys for Defendant

Cascade Drilling, L.P.

CAPSTONE LAW APC

Robert Drexler

Robert.Drexler@CapstoneLawyers.com

Molly DeSario

Molly.DeSario@CapstoneLawyers.com

Jonathan Lee

Jonathan.Lee@CapstoneLawyers.com

Eduardo Santos

Eduardo.Santos@capstonelawyers.com

Attorneys for Plaintiffs

Eugene Martinez and Robert Williams

LAWYERS FOR JUSTICE, PC

Edwin Aiwarzian, Esq.

edwin@calljustice.com

Arby Aiwarzian, Esq.

arby@calljustice.com

Joanna Ghosh, Esq.

joanna@calljustice.com

Attorneys for Plaintiffs

John Lilla

☒	(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