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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: JCCP 5215

ASSIGNED FOR ALL PURPOSES TO
JUDGE STEPHEN KAUS, DEPARTMENT
19

CLASS & REPRESENTATIVE ACTION

**DECLARATION OF ROBERT SPENCER
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA ACTION
SETTLEMENT**

Time: 3:00 p.m.
Date: January 9, 2023
Dept.: 19

Reservation No: 218655095643

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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, counsel for Plaintiffs Eugene Martinez and
4 Robert Williams ("*Martinez Plaintiffs*"), and proposed co-Class Counsel in this action. I have
5 personal 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. I personally uploaded the following documents to the LWDA website: 1)
8 Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action and Private
9 Attorney General Act Settlement and Memorandum of Points and Authorities in Support Thereof,
10 2) Declaration of Eric A. Grover in Support of Motion for Preliminary Approval of Class Action
11 and Private Attorney General Act Settlement, 3) the Declaration of Raul Perez in Support of
12 Motion for Preliminary Approval of Class Action and Private Attorney General Act Settlement,
13 4) Declaration of Joanna Ghosh in Support of Motion for Preliminary Approval of Class Action
14 and Private Attorney General Act Settlement, 5) the proposed order, and 6) this declaration.

15
16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct, and that this Declaration was executed on this 30th day of
18 November 2022, at San Francisco, California.

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21 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 **November 30, 2022**, in the case of *Cascade Drilling Wage and Hour Cases*, JCCP No. 5215, I served the foregoing document(s):

DECLARATION OF ROBERT SPENCER IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT

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