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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 PLAINTIFF ROBERT
WILLIAMS IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT AND
MOTION FOR AWARD OF ATTORNEYS'
FEES AND COSTS, CLASS
REPRESENTATIVE INCENTIVE
AWARDS, AND SETTLEMENT COSTS**

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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26 JOHN LILLA

1 I, ROBERT WILLIAMS, declare as follows:

2 1. I am a named Plaintiff and Class Representative in the case against Cascade
3 Drilling, L.P. (“Cascade Drilling”). I submit this Declaration in support of Plaintiffs’ Motion for
4 Final Approval. I am a competent adult, I have personal knowledge of the facts set forth in this
5 declaration, and I could and would testify competently under oath if called as a witness.

6 2. I worked for Cascade Drilling from approximately mid-2016 through June 2020 at
7 various locations in California.

8 3. I believed it was wrong for Cascade Drilling to not pay employees for all hours
9 worked as well as to not provide adequate meal and rest periods.

10 4. My case against Cascade Drilling was filed on March 3, 2021. Prior to filing the
11 complaint, I first spoke with my attorneys at Capstone Law APC (“Capstone”). Capstone and I
12 discussed bringing this case with another firm, Keller Grover LLP. I then spoke to my attorney
13 Robert Spencer, Esq. of Keller Grover LLP. I spent over an hour describing to Mr. Spencer the
14 facts of my case. We also the discussed process of class action litigation as well as my
15 responsibilities as a class representative. We also discussed the fact that this case would be also
16 be brought as a PAGA action and what that meant, including that a PAGA action is an
17 enforcement action on behalf of the State of California that seeks penalties. I then determined
18 that Capstone and Keller Grover LLP were the proper attorneys to bring my case.

19 5. I worked with Mr. Spencer to draft the PAGA letter over the telephone. I also
20 spent an hour reviewing it before it was sent to the LWDA. Mr. Spencer also provided me a draft
21 of original complaint. I spent an hour reviewing it before it was filed to make sure it was
22 accurate. The complaint was later amended to add PAGA causes of action, I also reviewed that
23 before it was filed.

24 6. Defendant propounded discovery in September 2021, including 35 special
25 interrogatories, 32 form interrogatories – employment, eight form interrogatories – general, and
26 19 requests for production of documents. Due to the sheer number of requests I had to respond
27 to, I had to have multiple telephone calls with Mr. Spencer in order to draft the responses and
28 make sure they were accurate. I spent numerous hours with Mr. Spencer over multiple days in

1 order to draft all the interrogatory responses. These telephone calls were very long, close to two
2 hours at a time. I also previously provided my attorneys with the documents I found that were
3 related to the case, but I did another search over a couple of days to make sure all the responsive
4 documents were produced. I also spent approximately three hours reviewing my responses to
5 make sure they were accurate.

6 7. Mr. Spencer made me aware that another case like mine was filed by Plaintiff John
7 Lilla. We discussed that Defendant filed a petition to coordinate our cases together. I discussed
8 this with Mr. Spencer and what it meant for the case.

9 8. Mr. Spencer made me aware that Cascade Drilling was open to mediating this
10 action. I kept up to date regarding the mediation and made sure I was available on the date of the
11 mediation in order to answer any questions that Mr. Spencer had. I reviewed the Stipulation for
12 Settlement of Class Settlement and Release (“Settlement Agreement”) with Mr. Spencer and
13 spent approximately half an hour discussing with him regarding how the settlement funds were
14 to be distributed and whether the settlement and the plan of distribution were fair. I then spent
15 another hour reviewing the Settlement Agreement.

16 9. Throughout my involvement in the case, I have maintained regular telephonic
17 communications with Mr. Spencer to discuss the status of the case and to respond to any
18 questions he might have. I also call him about once a month to check on the status.

19 10. When I agreed to act as a named plaintiff, I understood that I might be responsible
20 for some of the costs incurred by Defendant if the lawsuit was unsuccessful. In addition to this, I
21 worried about my reputation in the community if people were to find out I had sued somebody.

22 11. I also am concerned about the possible repercussions to my future job
23 opportunities because I have been a plaintiff in a wage and hour lawsuit against an employer.

24 12. I understood from the beginning that I was pursuing this case not only for my own
25 benefit, but also for the benefit of large numbers of past and present employees who either were
26 not aware of their rights or were too afraid of retaliation to complain.

27 13. I believe that the settlement reached in this case is fair and, in light of the risks
28 involved, will justly compensate the employees who were and are affected by the violations that

were the subject of the action. I believe that the enhancement I have requested is fair in light of the work I put into the case, the risks I took, the harm that I believe my suing my employer could cause me in terms of future job prospects, and the benefits that have been achieved for the class and the aggrieved employees. I have also provided a general release of my claims.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this Declaration was executed on 5/18/2023 at Longview, Washington.

DocuSigned by:
ROBERT WILLIAMS
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ROBERT WILLIAMS

1 were the subject of the action. I believe that the enhancement I have requested is fair in light of
2 the work I put into the case, the risks I took, the harm that I believe my suing my employer could
3 cause me in terms of future job prospects, and the benefits that have been achieved for the class
4 and the aggrieved employees. I have also provided a general release of my claims.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct, and that this Declaration was executed on _____ at
7 Longview, Washington.

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10 _____
11 ROBERT WILLIAMS
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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 *Martinez, et al. v. Cascade Drilling, L.P.*, Alameda County Superior Court, Case Number RG21090743, I served the foregoing document(s):

DECLARATION OF ROBERT WILLIAMS 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