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

MICHAEL HARRINGTON and BRANDON
OLDHAM, on behalf of themselves, and all
others similarly situated, and all aggrieved
employees,

Plaintiffs,

v.

CREATIVE SECURITY COMPANY, INC.;
and DOES 1 through 50, inclusive,

Defendants

Case No: RG21095377

CLASS & REPRESENTATIVE ACTION

*Assigned for All Purposes to the Honorable
Brad Seligman, Dept. 23*

**DECLARATION OF PLAINTIFF
BRANDON OLDHAM 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: February 14, 2023
Time: 3:00 p.m.
Dept. 23
Judge: The Hon. Brad Seligman

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

**Reservation No: A-21095377-001
Reservation No: A-21095377-002**

1 I, BRANDON OLDHAM, declare as follows:

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

7 2. I worked for Creative Security as an hourly non-exempt stationary security guard
8 in the bay area from approximately April 2020 through January 2021 at various client locations
9 in California.

10 3. I believed it was wrong for Creative Security to not provide adequate meal and rest
11 periods.

12 4. I was added to this action through the Second Amended Complaint that was filed
13 on September 30, 2022. Prior to the filing of the Second Amended Complaint, I spoke with one
14 of my attorneys, Robert Spencer, Esq. of Keller Grover LLP. I spent over an hour describing to
15 Mr. Spencer the facts of my case. I also had a separate conversation with him for over an hour to
16 discuss the process of class action litigation as well as my responsibilities as a class
17 representative. We discussed that there was already a case against Creative Security with
18 Plaintiff Harrington. We discussed the status of the case, as well as the approval process,
19 including the Court’s initial denial of preliminary approval, as well as the steps that we needed
20 to take in order to obtain approval at the next hearing. We also discussed that my attorneys
21 would engage in additional interviews of putative class members as well as review their payroll
22 and time records.

23 5. When the Amended Joint Stipulation for Settlement of Class Action and PAGA
24 Settlement and Release of Claims (“Amended Settlement Agreement”) was ready, I spent
25 approximately half an hour discussing it with Mr. Spencer as well as another hour reviewing it. I
26 also reviewed the Second Amended Complaint, which added me to the case.
27
28

DocuSigned by:
Brandon Oldham
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BRANDON OLDHAM

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 **January 27, 2023**, in the case of *Harrington v. Creative Security Company, Inc., et al.*, Alameda County Superior Court Case Number RG21095377, I served the foregoing document(s):

DECLARATION OF PLAINTIFF BRANDON OLDHAM 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

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

Rona P. Layton, Esq.
Layton Law Firm
111 North Market Street # 300
San Jose, California 95113
rlayton@laytonlawfirm.com

Attorneys for Defendant
CREATIVE SECURITY COMPANY, INC

☒	(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