

ERIC A. GROVER (SBN 136080)
eagrover@kellergrover.com
ROBERT W. SPENCER (SBN 238491)
rspencer@kellergrover.com

KELLER GROVER LLP

1965 Market Street
San Francisco, California 94103
Telephone: (415) 543-1305
Facsimile: (415) 543-7861

Attorneys for Plaintiffs
MICHAEL HARRINGTON and BRANDON OLDHAM

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 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
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

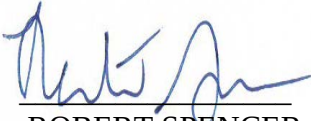
Reservation No: A-21095377-001
Reservation No: A-21095377-002

1 I, 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, for Plaintiffs Michael Harrington and
4 Brandon Oldham and proposed Class Counsel in this action. I have personal knowledge of the
5 facts stated herein and, if called as a witness, I could and would testify competently to the facts
6 set forth below.

7 2. On January 27, 2023, I personally uploaded the following documents to the
8 LWDA website: 1) Plaintiffs' Notice of Motion and Motion for Final Approval of Class and
9 PAGA Action Settlement and Memorandum of Points and Authorities in Support Thereof, 2)
10 Plaintiffs' Notice of Motion and Motion for Award of Reasonable Attorneys' Fees and Costs,
11 Class Representative Enhancements, and Settlement Administration Fees, Memorandum of
12 Points and Authorities in Support Thereof, 3) Declaration of Eric A. Grover in Support of
13 Motion for Final Approval of Class and PAGA Action Settlement and Motion for Award of
14 Reasonable Attorneys' Fees and Costs, Class Representative Enhancements, and Settlement
15 Administration Fees, 4) Declaration of Taylor Mitzner Regarding Settlement Notice
16 Administration, 5) Declaration of Plaintiff Michael Harrington in Support of Motion for Final
17 Approval of Class and PAGA Action Settlement and Motion for Award of Attorneys' Fees and
18 Costs, Class Representative Incentive Awards, and Settlement Costs, 6) Declaration of Plaintiff
19 Brandon Oldham in Support of Motion for Final Approval of Class and PAGA Action
20 Settlement and Motion for Award of Attorneys' Fees and Costs, Class Representative Incentive
21 Awards, and Settlement Costs, 7) the proposed order, 8) this declaration, and 9) the Amended
22 Joint Stipulation of Class Action and PAGA Settlement and Release of Claims.

23 I declare under penalty of perjury under the laws of the State of California and the United
24 States that the foregoing is true and correct, and that this Declaration was executed on this 27th
25 day of January, 2023 at San Francisco, California.

26 
27 ROBERT SPENCER
28

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, et al., v. Creative Security Company, Inc., et al.*, Alameda County Superior Court Case Number RG21095377, 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 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