

Larry W. Lee [CSB No. 228175]  
*lwlee@diversitylaw.com*  
 Kristen M. Agnew [CSB No. 247656]  
*kagnew@diversitylaw.com*  
 Nicholas Rosenthal [CSB No. 268297]  
*nrosenthal@diversitylaw.com*  
 DIVERSITY LAW GROUP, P.C.  
 515 S. Figueroa Street, Suite 1250  
 Los Angeles, CA 90071  
 Tel: (213) 488-6555 | Fax: (213) 488-6554

Brian J. Mankin, Esq. [CSB No. 216228]  
*brian@lmlfirm.com*  
 Misty M. Lauby [CSB No. 243009]  
*misty@lmlfirm.com*  
 LAUBY, MANKIN & LAUBY, LLP  
 5198 Arlington Avenue, PMB 513  
 Riverside, CA 92504  
 Tel: (951) 320-1444 | Fax: (951) 320-1445

Attorneys for Plaintiffs, on a representative basis and on behalf of all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 FOR THE COUNTY OF SAN JOAQUIN**

JODIE BLANTON JR., YAZMIN  
 CORTES, and GABRIELA ESCRIBA,  
 individually, on a representative basis, and  
 on behalf of all others similarly situated;

Plaintiffs,

vs.

COMMUNICATIONS TEST DESIGN,  
 INC., a Pennsylvania Corporation; and  
 DOES 1 through 20, inclusive;

Defendants.

Case No.: STK-CV-VOE-2021-5136

[Assigned to Hon. Judge Robert T. Waters, Dept.  
 11B, for all purposes]

**DECLARATION OF JODIE BLANTON JR. IN  
 SUPPORT OF PLAINTIFFS' MOTION FOR  
 FINAL APPROVAL OF CLASS ACTION  
 SETTLEMENT**

Date: August 23, 2023

Time: 9:00 A.M.

Dept.: 11B

1 William L. Marder, Esq. [CSB No. 170131]  
2 POLARIS LAW GROUP  
3 501 San Benito Street, Suite 200  
4 Hollister, CA 95023  
5 Tel: (831) 531-4214 | Fax: (831) 634-0333

6 David G. Spivak [CSB No. 179684]  
7 *david@spivaklaw.com*  
8 THE SPIVAK LAW FIRM  
9 8605 Santa Monica Blvd, PMB 42554  
10 West Hollywood CA 90069  
11 Tel: (213) 725-9094 | Fax: (213) 634-2485

12 Louis M. Benowitz [CSB 262300]  
13 *louis@benowitzlaw.com*  
14 BENOWITZ LAW CORPORATION  
15 8605 Santa Monica Boulevard, PMB 97638  
16 West Hollywood CA 90069  
17 Tel: (818) 839-9610 | Fax: (818) 839-9610

18 Benjamin J. Smith [CSB 266712]  
19 *Benjy@thesmithlawcorp.com*  
20 SMITH LAW  
21 4515 Van Nuys Blvd., Ste 302  
22 Sherman Oaks CA 91403-5799  
23 Tel: (818) 839-9607 | Fax: (818) 839-9700

24 Attorneys for Plaintiffs, on a representative basis and on behalf of all others similarly  
25  
26  
27  
28

**DECLARATION OF JODIE BLANTON JR.**

I, Jodie Blanton Jr., hereby declare and state as follows:

1. I am an individual over the age of 18. I am the named plaintiff in the above-reference action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I have been employed by Defendant Communications Test Design, Inc. (“Defendant”) as a non-exempt, hourly employee since about approximately October 2019. During my employment, the wage statements I received from Defendant did not accurately identify all applicable overtime, double time, double overtime, shift differential, and meal premium rates and hours worked at each rate. Further, wage statements I received failed to include the pay period start date and the accurate total hours worked. Further, I did not receive uninterrupted meal and rest periods. Finally, when I received overtime it did not factor in multiple rates of pay I received in the pay period.

3. Prior to and subsequent to the filing of this lawsuit, I met with my attorneys to discuss the status of the case, provide information and documents to my attorneys, and assist my attorneys in gathering evidence to support the class claims. I consulted with my counsel regarding settlement negotiations and approved the settlement. I also reviewed numerous documents related to the case, including the Complaint, the settlement agreement, and my declarations in support of approval.

4. I understand that this action was brought on behalf of other similarly situated employees of Defendant in the State of California, and thus I am acting as a representative for the Class. As the class representative, I understand that it is my responsibility to act in the Class’s best interest and not my own. I agree that I will not put my own interests ahead of that of the Class. Moreover, I am not aware of any conflicts that exist between my interest and the interests of the Class that would impair or affect my ability to serve as representative for the Class.

5. I have and continue to be willing to assist in the investigation of this matter as well as make myself available for trial or any further proceeding in this matter as required to

1 represent the interests of the Class. I also understand my duties and responsibilities to the  
2 proposed class and will carry out those duties as necessary.

3 6. I have discussed the terms of the settlement with my attorneys, and based on the  
4 information provided, I believe the settlement to be fair, adequate, and reasonable for myself and  
5 for the entire Class.

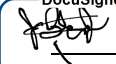
6 7. I am aware and have been aware from the inception of the case, that there is the  
7 risk that if I do not win my case, then I could be liable for Defendant's litigation fees and costs. I  
8 also understand that filing a case on my own behalf could have involved fewer costs and  
9 resolved faster than filing a class action. I accepted that risk in this case. Further, I believed and  
10 continue to believe that there is risk to me because I remain a current employee of Defendant.  
11 My understanding is that typically class action cases are brought by former employees of a  
12 company who cannot be retaliated against. However, to be clear, as of the signing of this  
13 declaration I am not aware of any retaliatory actions taken against me by Defendant.

14 8. I also understood that filing this lawsuit is a public record and I accepted that  
15 burden. As such, I risked my future employment in order to bring this action. Moreover, this  
16 lawsuit, which is a public record, is something that potential employers can look into, and which  
17 may negatively impact my future employment prospects.

18 9. I understand that because of my actions, many others have benefited by this case.  
19 I feel that I took upon myself the risk of this lawsuit and achieved a result for my other former  
20 co-workers who did not have to file suit.

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

23 Executed on this JB day of July 2023, at Los Angeles, California.

24 DocuSigned by:  
  
25 Jodie Blanton Jr.  
78190110994384.com