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13 Attorneys for PLAINTIFFS and the CLASS

14
15 SUPERIOR COURT OF THE STATE OF CALIFORNIA

16 FOR THE COUNTY OF STANISLAUS

17 BRANDON HAWKINS and BRIAN
18 CANADY, individually and on behalf of all
19 others similarly situated,

20 Plaintiff,

21 vs.

22 ONTEL SECURITY SERVICES, INC., a
23 California corporation; and DOES 1 through 50,
24 inclusive,

25 Defendants.

Case No. CV-20-005404

Consolidated with Case No. CV-21-002299

**DECLARATION OF PLAINTIFF
BRANDON HAWKINS IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: April 11, 2025

Time: 8:30 a.m.

Dept.: 23

1 I, Brandon Hawkins, hereby declare and state as follows:

2 1. I am an individual over the age of 18 years old. I am one of the named plaintiffs in this
3 matter. I have personal knowledge of the facts set forth below, and if called to testify I could and would
4 do so competently.

5 2. In or around June 2017, I was hired by Defendant Ontel Security Services, Inc.
6 (“Defendant”) to work as a non-exempt security guard. In or around October, 2020, my employment
7 with Defendant ended. Throughout my employment, I was denied 30-minute off-duty meal periods for
8 shifts longer than 5 hours. I also did not receive 10-minute off-duty rest periods for every 3.5 hours I
9 worked for Defendant. I also was not paid wages for all applicable minimum and overtime wages for all
10 hours worked, including for time spent maintaining my uniform. I also was not reimbursed business
11 expenses, including for cell phone expenses.

12 3. During the pendency of this lawsuit, I was required to provide assistance to my attorneys,
13 including meeting with them and providing them with documents and information. I estimate that I
14 spent approximately 40 hours meeting and/or conferring with my attorneys in connection with the
15 assistance of the class claims, such as providing information and various documents, reviewing and
16 signing the memorandum of understanding, the settlement agreement, and my declaration, and
17 reviewing the various pleadings in this case. I have continuously been kept apprised of the status of this
18 case.

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

25 5. I have and continue to be willing to assist in the investigation of this matter as well as
26 make myself available for trial or any further proceeding in this matter as required to represent the
27 interests of the Class. I also understand my duties and responsibilities to the proposed class and will
28 carry out those duties as necessary.

8 8. I understand that I could have been liable for Defendant's legal costs had Defendant
9 prevailed. I also understand that this lawsuit was filed in the public court records, which may affect my
10 ability to obtain future employment.

11 9. I understand that in addition to the claims that are being released by the proposed
12 settlement, I agreed to provide a general release of claims, which I understand is a more expansive
13 release than provided by the class members.

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

DocuSigned by:

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APPROVAL OF CLASS ACTION SETTLEMENT