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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

EVERETT ALEXANDER, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

KBR TECHNICAL SERVICES, INC., a Delaware
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. CIVSB2133085

(Assigned to the Hon. David Cohn, Dept. S-26)

**DECLARATION OF EVERETT
ALEXANDER IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: March 22, 2023

Time: 10:00 a.m.

Dept.: S-26

Complaint Filed: November 9, 2021

FAC Filed: November 29, 2022

Trial Date: Not Set

DECLARATION OF EVERETT ALEXANDER

I, Everett Alexander, declare 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 KBR Technical Services, Inc. ("Defendant") as a Tactical Vehicle Inspector since about September 2020. I work as an hourly, non-exempt employee.

3. Throughout my employment, the wage statements issued to me by Defendant did not identify the legal name and address of my employer. The employer is named as "KBR Tech Services Inc." and no address is provided. In addition, whenever I was paid overtime and/or double overtime wages, the wage statements issued to me did not identify all applicable hourly rates. Instead, my wage statements showed the same rate of pay for all types of wages paid.

4. I understand that this action was brought on behalf of all other employees in the State of California, and that I am acting as a representative for the Class. As a Class Representative, I understand that it is my responsibility to act in the best interests of the Class 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 interests 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, including meeting and discussing the case with my attorneys, providing any necessary information and documents, making myself available for trial or any further proceedings in this matter as required to represent the interests of the Class. I also understand my duties and responsibilities to the proposed Class and will carry out those duties as necessary.

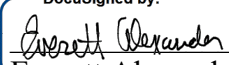
6. I have reviewed the Joint Stipulation of Class Action and PAGA Settlement ("Settlement Agreement") and discussed its terms with my attorneys. Based on the information provided, I believe the settlement to be fair, adequate, and reasonable for myself and for the entire Class.

7. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive

1 accomplishment and understand that other people will benefit because of the actions that I have
2 taken.

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

5 Executed on this ²⁵ day of November 2022, at Barstow, California.

6 DocuSigned by:

7 Everett Alexander