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

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE

DARREL NORTHRUP, individually, on a
representative basis, and on behalf of all others
similarly situated;

Plaintiff,

vs.

GUYOU CONSTRUCTION, INC., a
California Corporation; MARCUS A.
GUYOU, an individual; and DOES 1 through
20, inclusive;

Defendants.

Case No.: CVRI2105858
*[Assigned to Hon. Harold Hopp, Dept 1, for all
purposes]*

**DECLARATION OF DARREL
NORTHRUP IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing

Date: December 12, 2023
Time: 8:30 a.m.
Dept. 1

Complaint filed: December 29, 2021

I, Darrel Northrup, state and declare:

1. I am a Plaintiff in the above captioned action and have personal knowledge of all
matters stated herein and could competently testify thereto.

2. I make this declaration in support of the motion for final approval of the class
action settlement reached in this matter. As discussed herein, I believe that the settlement is fair
and reasonable and constitutes a fair resolution of the claims alleged.

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1 3. I was employed by Defendants from approximately November 16, 2020 through
2 December 17, 2021. During my employment for Defendants, there were several issues that
3 concerned me and which I thought did not comply with California law, such as not being paid
4 properly, not providing proper wage statements, and not getting proper meal periods and rest
5 breaks.

6 4. After retaining my attorneys, I understood that I had two options: I could pursue
7 my individual case alleging wage an hour issues to maximize my personal recovery, or I could
8 bring a class/representative action and put the interests of the class ahead of my own. The
9 decision of whether to bring my individual claims or to bring a class action put me in a tough
10 spot, because on the one hand, I wanted to hold the company accountable for how they treated
11 me and, on the other hand, I wanted to help other employees that were not paid correctly. And I
12 knew that, if I wanted to bring a class action, I would need to put the interests of the class first
13 to better serve the class. In the end, in the interest of helping all employees that were subjected
14 to the wage violations, I decided to help everyone by bringing a class/representative action.

15 5. I believe that Defendant's illegal wage and hour practices that form the basis for
16 the claims in this matter affected all of its hourly employees in a similar manner as they affected
17 me.

18 6. I was employed by Defendants in a non-exempt position during the alleged class
19 and PAGA periods and the claims that I made in this action are typical and impacted the entire
20 class of represented employees.

21 7. I believe that I have no conflicts of interest with other class members and have
22 agreed to place class interests above my own.

23 8. Since first initiating this action, I estimate that I have spent at least forty (40)
24 hours engaged in activities to benefit the class. I have assisted my attorneys in numerous ways,
25 including helping to explain and discuss the company's practices and their general practices and
26 procedures, and locating and analyzing company documents, and review of settlement
27 documents which I believe are fair to the class. These efforts occurred through telephone
28 conferences with Class Counsel, telephone conferences, letters, and email communications. I

1 also assisted in preparation for mediation and helped obtain a positive result for the class.

2 9. Moreover, in bringing this case, I was concerned that I could be “blackballed” as
3 a whistleblower, and this was a substantial risk that weighed heavily on my mind every day,
4 leading to substantial anxiety and stress.

5 10. For the reasons stated above, I respectfully request that the Court approve the
6 agreed-upon service award. As outlined above, I have performed substantial services for the
7 Class and helped obtain a beneficial settlement for my fellow employees despite the company’s
8 financial hardships. And I have also agreed, as part of this Class action settlement, to waive all of
9 my claims against the company as part of this settlement and in exchange for the service award –
10 which goes well beyond the release given by other class members.

11 I declare under penalty of perjury under the laws of the State of California that the
12 foregoing is true and correct. Executed on November 6, 2023, at Menifee,
13 California.

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15 By: 
16 Darrel Northrup (Nov 6, 2023 12:04 PST)
17 Darrel Northrup
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