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Terrence Kennedy, and Proposed Plaintiff
James Walker

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES—STANLEY MOSK COURTHOUSE**

TYRONE JOHNSON, TERRENCE KENNEDY;
individually, and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiffs,

vs.

PARSEC, INC., D/B/A/ OHIO PARSEC, INC.,
an Ohio corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 22STCV25427

Honorable Kristin Escalante
Department 24

CLASS ACTION

**DECLARATION OF TYRONE JOHNSON IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT AND APPROVAL
OF PAGA SETTLEMENT**

[Notice of Motion and Motion for Preliminary
Approval of Class Action Settlement and
Approval of PAGA Settlement; Declaration of
Class Counsel (Elizabeth Parker-Fawley);
Declarations of Proposed Class Representatives
(Terrence Kennedy and James Walker); and
[Proposed] Order filed concurrently herewith]

Date: July 15, 2024
Time: 8:30 a.m.
Department: 24

Complaint Filed: August 5, 2022
Trial Date: None Set

DECLARATION OF TYRONE JOHNSON

I, **Tyrone Johnson**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Parsec, Inc., d/b/a Ohio Parsec, Inc. ("Defendant") from approximately August 2019 to approximately March 2022 as a non-exempt, hourly-paid employee. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers *for* Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant paid me and other employees what was owed to us and was held accountable for its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately **8 hours**. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for **9 hours** discussing my situation, representative action lawsuits under the Private Attorney general Act ("PAGA"), and what it meant to bring a PAGA Action.

3. I have spent over **31 hours** communicating with my attorneys regarding the case and fulfilling my responsibilities as a class and PAGA representative, which included gathering documents concerning my employment with Defendant, reviewing documents with my attorneys, providing information regarding the duties of hourly-paid and non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Defendant. I routinely checked in with my attorneys and their staff to make sure that they had all of my most current information and any additional information that I had obtained.

4. As the case progressed, I was available to answer any questions my attorneys had and was available to speak and meet with my attorneys whenever they needed me. I responded to them as quickly as possible and gave them as much information and identified as many documents as I could. I spent at least **26 additional hours** speaking with my attorneys about the case, identifying potential witnesses, providing my attorneys with documents and information concerning the case, and also describing policies, practices, and procedures of Defendant.

5. During the discovery phase of the litigation, I spent approximately **4 hours** providing information, locating documents, and providing documents and information, to my attorneys, in connection with my deposition and Initial Disclosures.

6. On June 6, 2023, I attended a full day of deposition that lasted approximately **5 hours**. I spent at least **5 hours** preparing for the deposition. After the deposition, I spent at least **2 hours** reviewing my testimony and discussing the contents of the deposition transcript with my attorneys.

7. As far as the settlement is concerned, I was available to review documents and answer any questions my attorneys had. I spent about **5 hours** reviewing the settlement agreement and about **4 hours** asking questions and discussing the potential settlement with my attorneys before signing the settlement agreement.

8. I believe that I have done everything that my attorneys have asked of me and have tried, to the best of my ability, to seek relief for the aggrieved employees and the State of California. I think my efforts helped to get the result obtained in this case, and as a PAGA representative.

9. I respectfully request that the Court award me a general release fee in the amount of \$15,000.00 for my active participation in this case. Taking into consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

10. I am not related to anyone associated with Lawyers *for* Justice, PC.

11. I have not entered into any undisclosed agreements, nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever amount the Court awards as a Class Representative Service Payment, my share of the settlement as class member and aggrieved employee, and payment from Defendant in connection with a contemplated separate confidential individual settlement and general release agreement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 17 day of June 2024, at Inglewood, California.

Electronically Signed 2024-06-18 04:21:44 UTC - 172.58.211.161
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Tyrone Johnson