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PARSEC, INC. D/B/A OHIO PARSEC, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

TYRONE JOHNSON, TERRENCE
KENNEDY, individually, and on behalf of
other members of the general public similarly
situated;

Plaintiffs,

vs.

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

Defendants.

Case No. 2:22-cv-06930-AH-MAR

*Assigned for all purposes to Honorable
Anne Hwang*

**DECLARATION OF ADAM Y.
SIEGEL IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT
AND APPROVAL OF PAGA
SETTLEMENT**

Complaint Filed: August 8, 2022

DECLARATION OF ADAM Y. SIEGEL

I, Adam Y. Siegel, declare as follows:

1. I am an attorney admitted to practice before all courts of the State of California and before this Court. I am a Partner with the law firm Jackson Lewis P.C., counsel of record for Defendant Parsec, Inc. d/b/a/ Ohio Parsec, Inc. (“Defendant”). I make the following declaration based on personal knowledge, and on my review of and familiarity with Defendant’s files and documents in the above-captioned matter. If called as a witness, I could and would competently testify to the facts contained herein. I submit this declaration in support of Plaintiffs Tyrone Johnson, Terrence Kennedy, and James Walkers’ Motion for Preliminary Approval of Class Action Settlement and Approval PAGA Settlement.

2. I have been counsel of record for Defendant in this action since the filing of Plaintiffs’ suit on August 8, 2022, in the Superior Court of the State of California for the County of Los Angeles. In my capacity as counsel of record, I am familiar with Defendant’s employment policies and practices, including the employment-related files kept by Defendant for the purposes of this action, including, but not limited to, payroll records, time records, and personnel files of the putative class members.

3. Further, in my capacity as counsel of record, I am familiar that Defendant’s California non-exempt workforce is and has been almost entirely unionized throughout the Class Period (August 8, 2018 through September 27, 2023), with the exception of a small number of employees in the clerical and administrative departments, which account for less than 4% of the putative class members (approximately 104 putative class members).

4. Based on my review of the collective bargaining agreements that govern the employment of putative class members during the Class Period, the normal workweek of employees throughout the Class Period consist of five (5) consecutive eight (8) hour days or four (4) consecutive (10) hour days, notwithstanding any overtime hours worked.

5. Similarly, based on my review of the policies in the employee handbook for non-unionized employees, the handful of non-unionized non-exempt employees in

1 California have a typical schedule that consists of five (5) consecutive eight (8) hour days
2 from Monday to Friday, notwithstanding any overtime hours worked.

3 6. In preparation for mediation, my office, on behalf of Defendant, provided
4 Plaintiff's counsel with information regarding the putative class, including the number of
5 workweeks worked by the putative class members during the Class Period. To calculate
6 the number of workweeks, my office reviewed the putative class members' time and
7 payroll records to determine the actual number of workweeks worked by each putative
8 class member as opposed to simply reviewing their hire and separation dates. This method
9 of calculation resulted in a more accurate count of workweeks including accounting for
10 any leaves of absence.

11 I declare under the penalty of perjury under the laws of the State of California and
12 the United States of America that the foregoing is true and correct.

13 Executed this 7th day of April, 2025 in Los Angeles, California.

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16 /s/ Adam Y. Siegel
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