

PIMENTEL LAW, P.C.
Gabriel J. Pimentel, Esq. (SBN 265328)
GJP@PimentelLaw.com
Jenna M. Koleson, Esq. (SBN 350355)
JMK@PimentelLaw.com
30 N. Raymond Avenue, Suite 210
Pasadena, CA 91103
Telephone: (626) 765-6505
Fax: (626) 628-3041

Attorneys for Plaintiff,
JERIME SAUNDERS

IN THE SUPERIOR COURT OF CALIFORNIA

COUNTY OF SACRAMENTO, GORDON D. SCHABER SUPERIOR COURT

JERIME SAUNDERS, an individual, on behalf
of all other similarly situated,

Plaintiff,

vs.

PROGRESSIVE HOUSING, INC., a California
corporation; CATHY LEMKE, an individual;
FRED LEMKE, an individual; and DOES 1
through 20 inclusive,

Defendants.

Case No. 34-2022-00331427

Assigned to Jill Talley in Dept. 23

**DECLARATION OF PLAINTIFF JERIME
SAUNDERS IN SUPPORT OF HIS
MOTION FOR PRELIMINARY
APPROVAL**

Date: April 25, 2025

Time: 9:00 AM

Dept.: 23

Action Filed: December 13, 2022

Trial Date: **None**

DECLARATION OF PLAINTIFF JERIME SAUNDERS

I, Jerime Saunders, declare as follows:

1. I am over the age of eighteen (18) and have personal knowledge of all facts contained within this Declaration.

2. If called to testify to any fact contained within this Declaration, I would and could be competent to do so.

3. I submit this Declaration knowing it is made under oath and understanding that it will be filed with the Court in support of Plaintiffs' Motion for Preliminary Approval of Class Action

1 Settlement in this Matter.

2 4. I worked as a service technician for Happy Daze RV, incorporated under Progressive
3 Housing, Inc., from January 3, 2022, to August 11, 2022, located at 1199 El Camino Ave, Sacramento,
4 CA 95815. My job duties included pre-delivery inspections on new and used RVs before clients took
5 possession. I worked Monday through Friday, from 8:00AM to 4:30PM and was paid \$25 per hour. I
6 spent roughly \$4,000 on tools to perform my job duties at Happy Daze RV that I have not received
7 reimbursement for.

8 5. I have participated in all aspects of litigation from pre-litigation investigation
9 through settlement discussions. I have tasked myself to keep apprised of the developments
10 with my case and reach out to my attorney's office for updates. These calls are separate from
11 phone calls initiated by my attorneys asking for information to assist in litigation.

12 6. I have had numerous discussions with my attorneys regarding Defendants'
13 employment practices. I spent a considerable amount of time learning about California's labor
14 laws, deciding whether violations had occurred and searching for competent attorneys to
15 handle my case.

16 7. I spent numerous hours discussing my case with my attorneys, which involved
17 answering my lawyer's questions about Defendants' policies and practices regarding their
18 employment practices. I searched for, and produced, documents that I had from my
19 employment and helped my attorneys understand the company structure so that they could
20 determine who else would have helpful information about the policies and practices. I also
21 facilitated my lawyer's interviewing of other employees.

22 8. I attended two mediation sessions, totaling over 12 hours including preparation
23 with my attorneys.

24 9. I reviewed and signed the Memorandum of Understanding ("MOU"), and I also
25 reviewed and signed the extensive Settlement Agreement reached in this case.

26 10. Including my time spent meeting attorneys, I estimate I have spent 50 hours
27 devoted to this lawsuit.

28 11. I took a significant risk, both professionally and monetarily, in acting as Class

1 Representative. Any company that I apply to for future employment will have the ability to
2 run a public record search and find out that I filed this lawsuit, which could lead to a lost job
3 opportunity.

4 12. The requested enhancement award of \$10,000 is reasonable given the excellent
5 settlement for putative class members.

6 13. As part of the Settlement, I am providing Defendants with a complete release of
7 every possible claim against them rather than simply a release for the wage and hour claims
8 alleged in the complaint. I agreed to this additional release as consideration for resolving the
9 present action.

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

12 Dated: Mar 28, 2025

By:

 Saunders (Mar 28, 2025 17:17 PDT)

Jerime Saunders

Declaration of Plaintiff Jerime Saunders (1)

Final Audit Report

2025-03-29

Created:	2025-03-28
By:	Viktoria Baklan (vab@pimentellaw.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAxyc3M5AFK5ztAbrOUtJF0WfQGzUM4jp7

"Declaration of Plaintiff Jerime Saunders (1)" History

-  Document created by Viktoria Baklan (vab@pimentellaw.com)
2025-03-28 - 9:45:21 PM GMT
-  Document emailed to jerime31@gmail.com for signature
2025-03-28 - 9:45:24 PM GMT
-  Email viewed by jerime31@gmail.com
2025-03-29 - 0:16:34 AM GMT
-  Signer jerime31@gmail.com entered name at signing as jerime saunders
2025-03-29 - 0:17:56 AM GMT
-  Document e-signed by jerime saunders (jerime31@gmail.com)
Signature Date: 2025-03-29 - 0:17:58 AM GMT - Time Source: server
-  Agreement completed.
2025-03-29 - 0:17:58 AM GMT