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7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **FOR THE COUNTY OF SACRAMENTO**
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10 QUENTIN COSTEIU; individually, and on
behalf of other members of the general public
11 similarly situated and on behalf of other
aggrieved employees pursuant to the
12 California Private Attorneys General Act;

13 Plaintiff,

14 vs.

15 INTERTEK TESTING SERVICES, an
unknown business entity; INTERTEK USA
16 INC., an unknown business entity; and DOES
1 through 100, inclusive,

17 Defendants.
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Case No.: 34-2016-00189662

Honorable Christopher E. Krueger
Department 54

**DECLARATION OF QUENTIN
COSTEIU IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

[Notice of Motion and Motion for
Preliminary Approval of Class Action
Settlement; Declaration of Proposed Class
Counsel (Edwin Aiwazian); and [Proposed]
Order filed concurrently herewith]

Date: March 27, 2019
Time: 9:00 a.m.
Department: 54

Complaint Filed: January 26, 2016
Jury Trial: None Set

DECLARATION OF QUENTIN COSTEIU

I, **Quentin Costeiu**, 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 Defendant Intertek USA, Inc. and Intertek Test Services N.A., Inc. ("Intertek") in an hourly-paid, non-exempt position from approximately December 2014 to July 2015. I decided to seek legal advice about my work experiences with Intertek 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 Intertek paid me and other employees what was owed to us and stopped 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 class action lawsuits on my own and did some research into the leading class action and employment law firms in California for approximately 6 hours. Thereafter, I consulted with the attorneys at Lawyers *for* Justice, PC for 4 hours discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act ("PAGA"), and what it meant to be a named plaintiff, class representative, and PAGA Representative.

3. Since becoming involved in this case, I have spent over 12 hours meeting with my attorneys regarding the case and fulfilling my responsibilities as a class representative, which included gathering documents concerning my employment with Intertek, reviewing documents with my attorneys and answering their questions, answering questions and providing guidance regarding the duties of non-exempt employees, and helping develop a strategy as to what documents and information to obtain from Intertek. 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.

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1 4. Throughout the case, I was available to answer any questions my attorneys had,
2 and available to speak and meet with my attorneys whenever they needed me. I responded to
3 them as quickly as possible and gave them as much information and identified as many
4 documents as I could. I spent at least 8 additional hours speaking with my attorneys about the
5 case, identifying potential witnesses, providing my attorneys with documents and information
6 concerning the case, and also describing policies, practices, and procedures of Intertek. In
7 addition, during the discovery phase of this case, I spent at least an additional 6 hours reviewing
8 Intertek, Inc.'s discovery requests, locating documents, and providing responses and documents
9 to my attorneys.

10 5. On July 21, 2016, I attended a full day of deposition that lasted approximately 8
11 hours. I spent at least 3 hours preparing for the deposition and approximately 3 additional hours
12 traveling to and from the deposition. After the deposition, I spent at least 2 hours reviewing my
13 testimony and discussing the contents of the deposition transcript with my attorneys.

14 6. As far as the settlement is concerned, I was available to review documents and
15 answer any questions my attorneys had. I spent about 2 hours reviewing the settlement
16 agreement and about 1 hour asking questions and discussing the potential settlement with my
17 attorneys before signing the settlement agreement.

18 7. I believe that I have done everything that my attorneys have asked of me and have
19 tried, to the best of my ability, to represent the class. I think my efforts helped to get the result
20 obtained in this case, and as a class representative, I respectfully request that the Court award me
21 a service award in the amount of \$8,000.00 for my active participation in this case. Taking into
22 consideration the time that I have dedicated to this case, I believe that this amount is reasonable.

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

24 9. I have not entered into any undisclosed agreements, nor have I received any
25 undisclosed compensation in this case. The only compensation I will receive is whatever amount
26 the Court awards as a service award, as well as my share of the settlement fund as a class
27 member.

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

Executed this 30th day of September 2018, at Bay Point, California.

Quentin Costeiu
Quentin Costeiu