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6 Attorneys for Plaintiff MARYAMA ALHARK  
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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **COUNTY OF CONTRA COSTA**

11 MARYAMA ALHARK, as an individual  
12 on behalf of herself and on behalf of all  
others similarly situated,

13 Plaintiff,  
14

15 v.

16 CORTEVA AGRISCIENCE LLC, a  
Delaware limited liability company;  
17 HUNTER INTERNATIONAL, INC., an  
Ohio corporation; and DOES 1-100,  
18 inclusive,

19 Defendants.  
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Case No.: C22-02772  
(Consolidated with Case No. C23-00468)

Assigned For All Purposes to:  
Hon. Edward Weil  
Dept. 39

**DECLARATION OF MARYAMA  
ALHARK**

Date: TBD  
Time: 9:00 a.m.  
Dept.: 39

1 I, MARYAMA ALHARK, declare as follows:

2 1. I am an adult over the age of eighteen (18) years old. I am a plaintiff in the  
3 above-captioned lawsuit. I have personal knowledge of the facts set forth in this declaration. I  
4 make this declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action  
5 Settlement.

6 2. I worked for Defendant Corteva for about six weeks in 2022, and my job position  
7 was Document Maintenance Administrator. I was placed with Corteva via a staffing company  
8 called Hunter International, and I worked at the Corteva facility in Pittsburg, California.

9 3. While worked there I don't believe I was paid correctly for all the hours I worked  
10 because I was paid according to my scheduled hours even though I frequently had to work both  
11 before and after the scheduled start/stop times. I also would perform work during lunch breaks  
12 on occasion and I don't think that time was accounted or paid for either. Regardless of whether I  
13 took a lunch or had to work during lunch, the company also took 30 minutes of time away from  
14 my daily total. For the same reasons I don't believe I got all of my lunches and rest breaks like I  
15 was supposed to, and even if I wasn't working sometimes lunches would be late or interrupted. I  
16 also was constantly using my own phone while I was working to be able to log into my work  
17 computer as I had to use it for an authentication procedure via an app I had to download. I never  
18 received any kind of reimbursement for this.

19 4. I decided to file this lawsuit because I did not feel that I was treated fairly as an  
20 employee of Defendant with regard to not being paid correctly, not getting all of my lunches and  
21 breaks like I was supposed to, and having to use my own phone with no reimbursement.

22 5. It is my understanding this lawsuit could not have been prosecuted or settled on  
23 behalf of the other employees unless I or some other current or former employee decided to  
24 serve as a named plaintiff and proposed class representative. In deciding to serve as a named  
25 plaintiff in this case, I understood that my name could be publicly attached to this lawsuit and  
26 that my work experiences to some extent would be set forth in a public court file. I recognized I  
27 would need to devote a certain amount of time that I could have spent otherwise. I also  
28 recognized my bringing the lawsuit carried some degree of risk for defendants' legal costs

1 among other things. Despite this, I decided to serve as the named plaintiff and class rep without  
2 any promise of recovery or compensation.

3 6. I am familiar with the work involved in prosecuting this case. I have participated  
4 in meetings, phone calls, and other communications with my lawyers regarding this case. I am  
5 familiar with the allegations and defenses of the claims in this case. I am familiar with the major  
6 events in this case, including the investigation performed by my lawyers, the mediations with  
7 Defendant that eventually resulted in this settlement, and the preparation of settlement papers  
8 and the need to obtain court approval of the proposed settlement. I participated in the litigation  
9 and provided my lawyers with information and documents regarding my employment with  
10 Defendant.

11 7. I believe that the proposed settlement obtained on behalf of the State and other  
12 aggrieved employees is excellent in view of the issues and risks involved with the case.

13 8. I believe I have fulfilled my duties as a named plaintiff, which required a  
14 significant amount of time and effort during the course of this case. These efforts required  
15 dedicating numerous hours to lawsuit activities including, but not limited to: (a) communicating  
16 with my attorneys to stay informed of ongoing developments in the case and to discuss the  
17 proposed settlement ultimately negotiated; (b) searching for and providing documents and other  
18 materials relating to my work experience; (c) responding to requests for information relating to  
19 my work experience; and (d) reviewing filings and key documents including drafts of the  
20 complaint and the settlement agreement. These tasks required my dedication of at least 20-25  
21 hours of my time, which time I honestly could have spent on family, personal time, or work. My  
22 understanding is that future tasks may require several more hours of my time. Further, at all  
23 times I was ready, willing and able to testify at deposition and/or trial. I believe I have been  
24 diligent and that I have acted above and beyond that of which is expected of a named plaintiff  
25 and proposed class representative to date and will continue to do so.

26 9. It is my opinion that \$10,000.00 is a fair and adequate award for my service as  
27 the named plaintiff and class representative, and in consideration for my general release of all  
28 claims against Defendant. I believe that amount is fair and reasonable in view of the work I

1 have and may have to continue to perform. I believe that my role as the named plaintiff and  
2 class representative in this lawsuit has resulted in a valuable benefit to the State and to the other  
3 employees, and I accepted the potential risk of being liable for the opposing parties' costs if we  
4 were unsuccessful in this lawsuit. I believed in this case, so I was willing to be the named  
5 plaintiff and class rep to risk this and pursue this representative litigation. I also accepted the  
6 risk that news of this lawsuit could also potentially impact my ability to secure other work.

7 9. Based on the time, service, risk, stress, potential stigma, loss of benefits and  
8 excellent outcome of this case, I believe the enhancement for me is fair and reasonable.

9 I declare under penalty of perjury under the laws of California that the foregoing is true  
10 and correct. Executed on 04 / 08 / 2025, at Livermore, California.

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13 Maryama Alhark  
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