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6 Bacon and Proposed Class Counsel

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **FOR THE COUNTY OF BUTTE**

10 JENNIFER RUSSELL AND SAMANTHA
BACON, on behalf of themselves and all
11 "aggrieved employees" pursuant to Labor
Code § 2698 *et seq.*,

12 Plaintiffs,

13 v.

14 TRC ENVIRONMENTAL
15 CORPORATION, a Connecticut
corporation, TRC FIELD SERVICES,
16 INC., a Delaware corporation, TRC
ENGINEERS, INC., a California
17 corporation, and DOES 1 through 10,
inclusive,

18 Defendants.

CASE NO: 23CV00826

*Assigned to the Hon. Tamara L. Mosbarger,
Dept. 1*

**DECLARATION OF SAMANTHA BACON IN
SUPPORT OF UNOPPOSED MOTION AND
UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND
REPRESENTATIVE ACTION SETTLEMENT**

Date: February 25, 2026
Time: 9:00 a.m.
Dept.: 1

Complaint Filed: April 3, 2023
FAC Filed: September 1, 2023

1 I, SAMANTHA BACON, hereby declare and state as follows:

2 1. I am a named Plaintiff in this lawsuit against Defendants TRC ENVIRONMENTAL
3 CORPORATION, TRC FIELD SERVICES, INC., and TRC ENGINEERS, INC. (collectively,
4 “Defendants”) and I submit this declaration in support of Plaintiffs’ Unopposed Motion for
5 Preliminary Approval of Class and Representative Action Settlement. I am a competent adult and
6 worked for Defendant TRC Environmental Corporation as a non-exempt employee during the
7 relevant time period. I have personal knowledge of the facts set forth herein, and if called as a
8 witness to testify to them, I could and would do so competently.

9 2. Prior to commencing this lawsuit, I reached out to my current attorneys when I
10 questioned the employment practices of Defendants. While the lawsuit was initially filed as an
11 individual wage action, I later accepted the opportunity to act as a Class Representative in a class
12 action on behalf of other employees of Defendants whom I believed were subjected to labor law
13 violations.

14 3. When calling my current attorneys, I specifically questioned Defendants’ policies
15 of failing to pay all wages due; failing to provide all meal and rest periods; failing to reimburse
16 for business expenses incurred; failing to timely compensate employees upon separation; and
17 issuing their employees deficient wage statements. After many discussions with my attorneys, I
18 discovered these may be unlawful practices and Defendants’ employees might have recourse for
19 them.

20 4. By bringing this lawsuit, and throughout its course, I have taken the interests of all
21 the employees into account. I knew that I could possibly earn an enhancement payment if this
22 case resolved itself favorably, but also knew that I could also be responsible for paying
23 Defendants’ attorneys’ costs if it did not. My objective in bringing this lawsuit was to put an end
24 to what I considered were unlawful practices on the part of Defendants. I believe this has been
25 achieved by this lawsuit and settlement.

5. I am satisfied that Defendants are compensating class members for unpaid wages, unreimbursed business expenses, premium wages for missed meal and rest periods, penalties, and interest that I believe we are due. I am very pleased about the outcome of this litigation.

6. From the beginning of this case, I spent time on numerous phone calls with my attorneys answering questions and explaining what I understood to be Defendants' policies procedures and how those policies and procedures applied to me and others I worked with. During this litigation, up through and following the settlement process, I was actively involved with its status, tracking the status of the case and contributing as much as possible.

7. I have not maintained detailed time records of my activities in connection with this litigation, however, I believe that I have spent and will spend a total of approximately 35 hours assisting my attorneys with the groundwork of this case, and doing work and analysis independent from my attorneys both before and during this case, including conducting my own independent investigation of the facts.

8. Before this litigation started, and throughout its course, I have spent approximately 9 or more hours organizing, gathering, and reviewing documents and information for this action. I filtered through many of my own documents and reviewed information provided by Defendants as part of this action.

9. I have taken an active participation in this lawsuit throughout its course, including communicating with my attorneys frequently to track my case's status.

10. This lawsuit will almost undoubtedly cause me reputational damage. There is a stigma associated with suing anyone, especially your former employer. I will possibly be adversely affected when it comes to obtaining future employment as employers who learn that I sued Defendants in a class action will likely avoid hiring me.

11. My interest in bringing this lawsuit has been for Defendants to change its labor practices going forward and to compensate current and former employees. These interests are the same as those of all other class members. I do not believe that I have any conflicts with other members of the class.

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

3 Executed on 01 / 21 / 2026 at Eureka, California.
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