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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 JENNIFER RUSSELL 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, JENNIFER RUSSELL, 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. I contacted my current attorneys when I questioned the employment practices of
10 Defendants prior to commencing this lawsuit. Although initially filed as an individual wage action,
11 I later accepted the opportunity to act as a Class Representative in a class action on behalf of other
12 employees of Defendants whom I believed were being subjected to labor law violations.

13 3. Specifically, I questioned Defendants’ policies of failing to pay all wages due;
14 failing to provide all meal and rest periods; failing to reimburse for business expenses incurred;
15 failing to timely compensate employees upon separation; and issuing their employees deficient
16 wage statements. Through many discussions with my lawyers, I learned these may be illegal
17 practices and Defendants’ employees might have recourse for them.

18 4. By bringing this lawsuit, and throughout its course, I considered the interests of all
19 the employees. I understood that I could possibly earn an enhancement payment if this case
20 resolved itself favorably, but also knew that I could also be responsible for paying Defendants’
21 attorneys’ costs if it did not. My goal in bringing this lawsuit was to put an end to what I believed
22 were illegal practices on the part of Defendants, and I believe I have achieved that through this
23 lawsuit and settlement.

24 5. I am very happy about the results of this litigation. I am satisfied that Defendants
25 are compensating class members for unpaid wages, unreimbursed business expenses, premium
26 wages for missed meal and rest periods, penalties, and interest that I believe we are due.
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1 6. At the onset of this case, I spent time through numerous phone calls with several of
2 my attorneys explaining what I understood to be the policies and procedures of Defendants and
3 how they were applied to me and others I worked with. During the course of this litigation, up
4 through and following the settlement process, I kept actively involved with its status, tracking the
5 status of the case and participating as much as possible.

6 7. While I have not maintained detailed time records of my activities in connection
7 with this litigation, I believe that I have spent and will spend a total of approximately 40 hours
8 assisting my attorneys with the preparation of this case, and doing work and analysis independent
9 from my attorneys both before and during this case, including conducting an independent
10 investigation of the facts.

11 8. Before this litigation commenced, and throughout its course, I have spent
12 approximately 8.5 or more hours gathering, organizing, and reviewing documents and information
13 for this lawsuit. I sifted through many of my own documents and reviewed information produced
14 by Defendants as part of this case.

15 9. I have communicated with my attorneys frequently to track my case's status. I have
16 taken active involvement in this matter throughout its course.

17 10. This lawsuit will almost certainly result in reputational harm to me. There is a
18 stigma associated with suing anyone, let alone your former employer. I will probably be adversely
19 affected when it comes to obtaining future employment – employers who learn that I sued
20 Defendants in a class action will likely avoid hiring me.

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

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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 Barstow, California.
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