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Attorneys for Plaintiff CHARMAINE TATE
As an individual and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF EL DORADO

CHARMAINE TATE, as an individual and on
behalf of all others similarly situated,

Plaintiffs,

vs.

PRO ENERGY SERVICES GROUP, LLC, a
Delaware Limited Liability Company; and DOES
1 through 50, inclusive,

Defendants.

Case No. 23CV0586

**DECLARATION OF DAVE CROCKETT IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

**Date: TBD
Time: 8:30 a.m.
Dept. 9**

1 I, Dave Crockett, declare as follows:

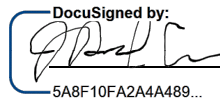
2 1. I am an individual over the age of 18. I am the plaintiff in a pending matter against
3 Defendant, Pro Energy Services Group, LLC. I have personal knowledge of the facts set forth below,
4 except as to those matters stated on information and belief and, as to those matters, I believe them to be
5 true. If called as a witness, I could testify competently as to the matters stated in this declaration.

6 2. In June of 2019, I began working for Pro Energy Services Group, LLC as a Senior
7 Program Manager. Until my employment ended in June of 2023, I was paid on an hourly basis as a non-
8 exempt employee and earned non-base hourly wages or other non-hourly, non-discretionary
9 remuneration, including for example per diems. I was not paid all overtime wages at one and one-half
10 times my regular rate of pay. I also was not timely paid all due wages during employment or upon
11 separation of employment and was not provided with accurate itemized wage statements.

12 3. I have taken all necessary steps to represent the interests of the Class, including by
13 providing information and documents to my counsel, discussing the claims and lawsuit with my counsel,
14 and answering any questions that have come up, including about how I was paid or what my wage
15 statements show or meant. I understand that I am responsible to the Class with respect to trying the case,
16 appearing in court, and working with Class Counsel. I am willing to act as a fiduciary for the Class. I
17 remain willing to devote my time to this lawsuit for the benefit of the Class. I do not believe I have any
18 interests that are adverse to the interests of the Class. I also am unaware of any such issues having been
19 raised or presented by anyone else.

20 4. I believe many employees would not sue their employer out of fear. I took on risks by
21 bringing this lawsuit, and I understand that other people will benefit because of the actions that I have
22 taken. I feel that it is a positive accomplishment, am proud of the result, and believe that the class
23 settlement is fair, adequate, and reasonable.

24 I declare under penalty of perjury under the laws of the State of California that the foregoing is
25 true and correct. Executed this 6th day of August 2024, at Webster, New York.

26 
27 5A8F10FA2A4A489...

Dave Crockett