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Attorneys for Plaintiff

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES**

CHE'TERRA YOUNG, an Individual, on behalf
of herself and all others similarly situated,

Plaintiff,

v.

PFT ALEXANDER, INC., a California
corporation; and DOES 1 through 10, inclusive,

Defendant.

Case No.: 23STCV07449
**CLASS AND REPRESENTATIVE
ACTION**

Assigned For All Purposes To:
Hon. Kenneth R. Freeman

**DECLARATION OF CHETERRA
YOUNG IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT**

Date: March 27, 2025
Time: 10:00 a.m.
Dept.: 14

Complaint filed: April 5, 2023
Trial Date: None Set

1 I, Cheterra Young, declare as follows:

2 1. I am the named plaintiff in this instant class action against Defendant PFT Alexander,
3 Inc., ("PFT"), and make this declaration in support of the Class and Representative Action Settlement. I
4 have personal knowledge of the facts stated in this declaration, except as to those matters stated upon
5 information or belief, and, as to those matters, I believe them to be true. If called as a witness, I could
6 and would testify truthfully and competently to the matters stated in this Declaration.

7 2. I am in no way related to anyone associated with or who works for The Markham Law
8 Firm or Cohelan Khoury & Singer.

9 3. I worked for PFT at its Signal Hill, California location, as a non-exempt service
10 coordinator from approximately June 2022 to March 2023. I was responsible for dispatching technicians
11 who serviced flow management and control systems, providing quotes to customers, and technician
12 billing.

13 4. After my employment with PFT ended, I decided to consult with an attorney. I felt I was
14 treated unfairly and not paid for all time worked, not provided with the meal and rest breaks that I was
15 entitled to, and not provided with proper wage statements. I initially spoke with the attorneys at Markham
16 Law Firm and later with the attorneys at Cohelan Khoury & Singer, and I told them about everything I
17 had experienced while working for PFT. I decided to become a named plaintiff in a class action against
18 PFT. My attorneys explained the duties and responsibilities of a class representative to me, and I decided
19 to undertake this role for the benefit of other employees of PFT who experienced the same issues that I
20 had experienced.

21 5. In the complaint I brought against PFT, I alleged that I was not paid for all hours worked.
22 I was told by PFT not to not clock in until my scheduled shift time if I had to report to work early, forcing
23 me to work off the clock.

24 6. Additionally, I alleged in my complaint that I was frequently interrupted and called back
25 to work during my meal breaks to answer urgent quote requests or respond to the management's
26 questions. I was not paid for that time worked and/or the premium payments I was entitled to. I also
27 alleged I was not able to take my first meal break before the sixth hour of work, and before eleventh hour
28 of work for a second meal break.

1 7. Further, I alleged in my complaint that for the same reasons I was unable to take my meal
2 breaks, there were times when I was unable to take my rest breaks, or that they were cut short due to
3 being interrupted and having to return to work. I was not paid for that time worked and/or the premium
4 payments I was entitled to.

5 8. I hoped that by filing this lawsuit, PFT would pay their employees for all hours worked,
6 and provide employees with their timely and uninterrupted meal and rest breaks as required by California
7 law.

8 9. I was very happy to learn that the case had settled on a class-wide and representative basis,
9 and it resulted in a settlement amount of \$225,000, from which payments will be made to settlement class
10 members/aggrieved employees. I think this is an excellent result. I am proud that because I felt that
11 something was wrong and decided to do something about it, the other employees will benefit financially.

12 10. I have devoted a lot of time to this case. This case has been pending for a long time; over
13 sixteen (16) months. I have spent many hours searching for documents, and reviewing documents my
14 attorneys asked me to review. I spent a lot of time answering my attorneys' questions by phone, emails,
15 and text messages about this case. I had to recall everything I could remember about the issues I
16 experienced while working for PFT.

17 11. I was on standby for a full-day mediation. During the mediation, I had to be available if
18 my attorneys called or emailed me, asking questions pertaining to my claims in this case.

19 12. I did my best to be available to my attorneys to answer any questions they had or provide
20 any information they needed. I returned their phone calls as promptly as I could and answered any
21 questions to the best of my ability. I complied with my attorneys' requests to review documents and
22 provide information.

23 13. By filing this lawsuit, I understood the risks involved. I was afraid of the possibility of
24 retaliation as a result of my role in this action. I now bear the stigma of bringing a class action wage
25 dispute against my former employer. Given the internet, it is quite likely that future possible employers
26 might find out that I acted as a class representative this action against an employer. Regardless, I am happy
27 to know that the time, effort, and information I provided helped to make this settlement possible.

28 14. I am also aware that if I lost this case, I might be responsible for PFT's costs of defending

1 this case. This substantially added to the stress of being a named plaintiff in this case.

2 15. At times, it was a challenge for me to participate while working and maintaining other
3 professional and personal responsibilities. Nevertheless, I believe my efforts benefited the LWDA and
4 other aggrieved employees and class members. For all of the reasons above, I believe I deserve a Service
5 Payment of \$10,000.

6 16. I have no conflict of interest with any other aggrieved employees or class members.

7 17. I will supplement this declaration at final approval and provide more information
8 regarding the extent of my participation in this action if required by the Court.

9
10 I declare under the penalty of perjury under the laws of United States and the State of California
11 that the foregoing is true and correct and that this declaration is executed on 8/17/2024, in
12 Bellflower, California.

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14 Cheterra Young
15 Cheterra Young
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