

1 ZACHARY M. CROSNER, ESQ. (SBN 272295)
zach@crosnerlegal.com
2 BRANDON BROUILLETTE, ESQ. (SBN 273156)
bbrouillette@crosnerlegal.com
3 CROSNER LEGAL, P.C.
4 9440 Santa Monica Blvd., Suite 301
Beverly Hills, CA 90210
5 Tel. (866) 276-7637
6 Fac. (818) 700-9973

7 Attorneys for Plaintiff PRICILLA COOPER

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF ALAMEDA**
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11
12 PRICILLA COOPER, as an individual and
on behalf of all others similarly situated,

13
14 Plaintiff,

15 v.

16 AMTEC HUMAN CAPITAL, INC., a
17 California Corporation; THE CLOROX
COMPANY, a Delaware Corporation;
18 THE CLOROX INTERNATIONAL
COMPANY, a Delaware Corporation; and
19 DOES 1-100, inclusive,

20 Defendants.
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Case No.: 23CV038864

Assigned for All Purposes to:
Hon. Michael Markman
Dept. 23

DECLARATION OF PRICILLA COOPER

Date: September 24, 2024
Time: 10:00 a.m.
Dept. 23

1 I, PRICILLA COOPER, 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 Amtec from around , and was assigned to work a Clorox
7 warehouse facility, where I worked as a repacker and palleter. While I worked there I don't
8 think I received all of the meal and rest breaks I was entitled to, as lunches and breaks would
9 start late, last less than 30 minutes, or be interrupted by work, even though 30 minutes of time
10 was deducted from my time each day. I also don't think I got all my 10 minute rest breaks as
11 well. I had to use my own phone for company business while on the clock, such as
12 communicating with supervisors, and never received any kind of reimbursement.

13 3. I decided to file this lawsuit because I did not feel that I was treated fairly as an
14 employee of Defendant, especially with regard to me not getting all of my lunches and other
15 breaks, and not getting anything for using my own phones.

16 4. It is my understanding this lawsuit could not have been prosecuted or settled on
17 behalf of the Class unless I or some other current or former employee decided to serve as a
18 named plaintiff and proposed class representative. In deciding to serve as a named plaintiff and
19 proposed class representative in this case, I understood that my name could be publicly attached
20 to this lawsuit and that my work experiences to some extent would be set forth in a public court
21 file. I recognized I would need to devote a certain amount of time that I could have spent
22 otherwise. I also recognized my bringing the lawsuit carried some degree of risk for defendants'
23 legal costs among other things. Despite this, I decided to serve as the named plaintiff and
24 proposed class representative, without any promise of recovery or compensation.

25 5. I am familiar with the work involved in prosecuting this case. I have participated
26 in meetings, phone calls, and other communications with my lawyers regarding this case. I am
27 familiar with the allegations and defenses of the claims in this case. I am familiar with the major
28 events in this case, including the investigation performed by my lawyers, the mediation with

1 Defendant that resulted in this settlement, and the preparation of settlement papers and the need
2 to obtain court approval of the proposed settlement. I participated in the litigation and provided
3 my lawyers with information and documents regarding my employment with Defendant.

4 6. I believe that the proposed class-wide settlement obtained on behalf of the Class
5 and other aggrieved employees is excellent in view of the issues and risks involved with the
6 case.

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

21 8. It is my opinion that \$10,000.00 is a fair and adequate award for my service as
22 the named plaintiff and proposed Class Representative, and in consideration for my general
23 release of all claims against Defendant. I believe that amount is fair and reasonable in view of
24 the work I have and will continue to perform on behalf of the Class. I believe that my role as the
25 class representative in this lawsuit has resulted in a valuable benefit to the Class Members, and I
26 accepted the potential risk of being liable for the opposing parties' costs if we were unsuccessful
27 in this lawsuit. I believed in this case, so I was willing to be the named plaintiff and proposed
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1 class representative to risk this and pursue this class action litigation. I also accepted the risk
2 that news of this lawsuit could also potentially impact my ability to secure other work.

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

5 I declare under penalty of perjury under the laws of California that the foregoing is true
6 and correct. Executed on 08 / 30 / 2024, at Vallejo, California.
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10 Pricilla Cooper