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James Walker

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TYRONE JOHNSON, TERRENCE
KENNEDY; individually, and on
behalf of other members of the
general public similarly situated and
on behalf of other aggrieved
employees pursuant to the California
Private Attorneys General Act;

Plaintiffs,

vs.

PARSEC, INC. D/B/A/ OHIO
PARSEC, INC., an Ohio corporation;
and DOES 1 through 100, inclusive,

Defendants.

Case No. 2:22-cv-06930-AH-MAR

Honorable Anne Hwang

CLASS ACTION

**DECLARATION OF TYRONE
JOHNSON IN SUPPORT OF
PLAINTIFFS' RENEWED MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT AND
APPROVAL OF PAGA
SETTLEMENT**

Date: May 7, 2025
Time: 1:30 PM
Courtroom: 7D

Complaint Filed: August 5, 2022
FAC Filed: November 15, 2024
Trial Date: October 21, 2025

DECLARATION OF TYRONE JOHNSON

I, **Tyrone Johnson**, hereby declare as follows:

1. I am over 18 years of age and a resident of California. I am the named plaintiff in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I was employed by Parsec, Inc. d/b/a Ohio Parsec, Inc. (“Defendant”) from approximately August 2019 to approximately October 2023 as a non-exempt, hourly-paid Crane Mechanic. I decided to seek legal advice about my work experiences with Defendant and about pursuing my grievances. I contacted Lawyers for Justice, PC and spoke with attorneys there. I wanted to do whatever I could to make sure Defendant paid me and other employees what was owed to us and was held accountable for its practice of not properly compensating its employees for all hours worked and non-compliant meal and rest breaks. After speaking with the attorneys, I investigated representative action lawsuits on my own and did some research into the leading employment law firms in California for approximately **8 hours**. Thereafter, I consulted with the attorneys at Lawyers for Justice, PC for **9 hours** discussing my situation, complex wage-and-hour class actions and representative actions under the Private Attorneys General Act (“PAGA”) in general, and what it meant to be a named plaintiff, class representative, and a PAGA representative.

3. Moving forward as a named plaintiff in this Action was not an easy decision. I was aware that by participating in a publicly-filed lawsuit, my name would be associated with a lawsuit against my employer. I was mindful that my supervisors at Defendant and other potential future employers might find out that I sued my employer, which could result in retaliation or harm my reputation and future employment prospects. However, I agreed to accept these risks because I felt that important rights were at stake, and I wanted to make sure that both current and former employees would be compensated for these violations and no longer have to experience these issues.

1 4. I have spent over **31 hours** communicating with my attorneys regarding
2 the case and fulfilling my responsibilities as a class and PAGA representative, which
3 included gathering documents concerning my employment with Defendant, reviewing
4 documents with my attorneys, providing information regarding the duties of hourly-
5 paid and non-exempt employees, and helping to develop a strategy as to what
6 documents and information to obtain from Defendant. I routinely checked in with my
7 attorneys and their staff to make sure that they had all of my most current information
8 and any additional information that I had obtained.

9 5. As the case progressed, I was available to answer any questions my
10 attorneys had and was available to speak and meet with my attorneys whenever they
11 needed me. I responded to them as quickly as possible and gave them as much
12 information and identified as many documents as I could. I spent at least **26 additional**
13 **hours** speaking with my attorneys about the case, identifying potential witnesses,
14 providing my attorneys with documents and information concerning the case, and also
15 describing policies, practices, and procedures of Defendant.

16 6. During the discovery phase of the litigation, I spent approximately **4**
17 **hours** providing information, locating documents, and providing documents and
18 information to my attorneys, in connection with my deposition and Initial Disclosures.

19 7. On June 6, 2023, I attended a full day of deposition that lasted
20 approximately **5 hours**. I spent at least **5 hours** preparing for the deposition. After the
21 deposition, I spent at least **2 hours** reviewing my testimony and discussing the
22 contents of the deposition transcript with my attorneys.

23 8. As far as the settlement is concerned, I was available to review
24 documents and answer any questions my attorneys had. I spent about **5 hours**
25 reviewing the settlement agreement and about **4 hours** asking questions and
26 discussing the potential settlement with my attorneys before signing the settlement
27 agreement.

28 9. I understand that a settlement has been reached in my case and what my
duties and responsibilities are as a class and PAGA representative. For example, I am

1 aware that if the settlement is granted preliminary approval, the Court will certify a
2 class for settlement purposes, and likely appoint me as the representative of the class
3 and my attorneys as counsel for the class. I also understand that my duties will include
4 checking in on, monitoring, and conferring with my attorneys to facilitate the notice
5 and settlement administration process, and to provide information that the Court needs
6 in order to assess whether the settlement is fair, reasonable, and adequate. Further, if
7 any individuals who are potential class members contact me, I will take steps to have
8 them referred to the Court-appointed settlement administrator so that these individuals
9 may receive the necessary information and notice they may be eligible to receive in
10 connection with the settlement and contemplated final approval hearing.

11 10. I believe that I have done everything that my attorneys have asked of me
12 and have tried, to the best of my ability, to seek relief for the class members, aggrieved
13 employees, and the State of California. I have volunteered to represent and champion
14 the interests of many other people with similar claims and injuries because of the
15 importance of the case and the necessity that all class members and aggrieved
16 employees benefit from the lawsuit equally. I understand that as a proposed class
17 representative, and if formally appointed as a class representative, I have and continue
18 to represent the interests of all members of the class in litigation to recover relief for
19 the class. As an hourly-paid employee of Defendant who was subject to the same
20 policies, practices, and procedures as the other members of the class, I have claims
21 that are typical of those of the class. I consider the interests of the class just as I would
22 consider my own interests. I understand that I may need to put the interests of the class
23 before my own interests, although I have no reason to believe that my interests are in
24 conflict with the interests of the class. I understand that any resolution of the lawsuit
25 is subject to court approval and must be in the best interest of the class as a whole. I
26 have participated, and continue to participate, in the lawsuit as necessary. I have
27 actively followed and monitored the progress of the lawsuit, and have taken steps to
28 make sure that the litigation is prosecuted by the skilled and effective attorneys that I

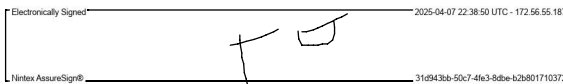
1 have retained.

2 11. I think my efforts helped to get the result obtained in this case, and as a
3 Class Representative, I respectfully request that the Court award me a Class
4 Representative Service Payment in the amount of \$15,000.00 for my active
5 participation in this case. Taking into consideration the time that I have dedicated to
6 this case, I believe that this amount is reasonable.

7 12. I am not related to anyone associated with Lawyers *for* Justice, PC.

8 13. I have not entered into any undisclosed agreements, nor have I received
9 any undisclosed compensation in this case. The only compensation I will receive is
10 whatever amount the Court awards as a Class Representative Service Payment, my
11 share of the settlement as a class member and aggrieved employee, and payment from
12 Defendant in connection with a contemplated separate confidential individual
13 settlement and general release agreement.

14 I declare under penalty of perjury under the laws of the State of California that
15 the foregoing is true and correct. Executed 04 07 2025, at
16 Inglewood, California.

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18 Nintex AssureSign® 31d943bb-50c7-44e3-8d8e-b2b801710372

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