

LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203

Edwin Aiwarzian (SBN 232943)
Elizabeth Parker-Fawley (SBN 301592)
LAWYERS for JUSTICE, PC
450 North Brand Blvd., Suite 900
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiffs Tyrone
Johnson, Terrence Kennedy, and
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 JAMES
WALKER 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 JAMES WALKER

I, **James Walker**, 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 September 2022 to approximately November 2022 as a non-exempt, hourly-paid Groundman. 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 **7 hours**. Thereafter, I consulted with the attorneys at Lawyers for Justice, PC for **6 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 a former employer. I was mindful that others at Defendant and other potential employers might find out that I sued my former employer which could 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.

4. I have spent over **18 hours** communicating with my attorneys regarding

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

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

15 6. As far as the settlement is concerned, I was available to review
16 documents and answer any questions my attorneys had. I spent about **4 hours**
17 reviewing the settlement agreement and about **3 hours** asking questions and
18 discussing the potential settlement with my attorneys before signing the settlement
19 agreement.

20 7. I understand that a settlement has been reached in my case and what my
21 duties and responsibilities are as a class and PAGA representative. For example, I am
22 aware that if the settlement is granted preliminary approval, the Court will certify a
23 class for settlement purposes, and likely appoint me as the representative of the class
24 and my attorneys as counsel for the class. I also understand that my duties will include
25 checking in on, monitoring, and conferring with my attorneys to facilitate the notice
26 and settlement administration process, and to provide information that the Court needs
27 in order to assess whether the settlement is fair, reasonable, and adequate. Further, if
28 any individuals who are potential class members contact me, I will take steps to have

1 them referred to the Court-appointed settlement administrator so that these individuals
2 may receive the necessary information and notice they may be eligible to receive in
3 connection with the settlement and contemplated final approval hearing.

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

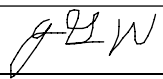
22 9. I think my efforts helped to get the result obtained in this case, and as a
23 Class Representative, I respectfully request that the Court award me a Class
24 Representative Service Payment in the amount of \$7,500.00 for my active
25 participation in this case. Taking into consideration the time that I have dedicated to
26 this case, I believe that this amount is reasonable.

27 10. I am not related to anyone associated with Lawyers for Justice, PC.

28 11. I have not entered into any undisclosed agreements, nor have I received

1 any undisclosed compensation in this case. The only compensation I will receive is
2 whatever amount the Court awards as a Class Representative Service Payment and my
3 share of the settlement as a class member and aggrieved employee.

4 I declare under penalty of perjury under the laws of the State of California that
5 the foregoing is true and correct. Executed 04/07/2025, at
6 Los Angeles, California.

7  2025-04-07 22:43:44 UTC - 76.39.65.169
8 Electronically Signed
Hintex AssureSign® 6a15a58-cbfe-4285-a271-b2b80173ac0b

James Walker

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