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5 Attorneys for Defendant
CW GOVERNMENT TRAVEL, INC.
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF KERN
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11 LISA HARPER, an individual, on behalf of
herself and on behalf of all persons similarly
12 situated,

13 Plaintiff,

14 v.

15 CW GOVERNMENT TRAVEL, INC., a
corporation; and DOES 1 through 50, inclusive,
16

17 Defendants.
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Case No. BCV-23-102216

**DECLARATION OF JODY A. LANDRY
RE WORKWEEKS IN CLASS PERIOD
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF
CLASS SETTLEMENT**

ASSIGNED FOR ALL PURPOSES TO
HON. THOMAS S. CLARK, DEPT. 17

Date: July 10, 2025
Time: 8:30 a.m.
Dept: 17

Trial Date: Not Set
Complaint Filed: July 11, 2023

20 I, Jody A. Landry, do hereby declare and state as follows:
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22 1. I am a shareholder with the firm of Littler Mendelson, attorneys of record for Defendant
CW Government Travel, Inc. ("Defendant").
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24 2. To help Defendant prepare for the mediation in this lawsuit I worked with Defendant's
payroll department to determine the putative class list and to estimate the number of weeks actually
25 worked by the putative class during the class period.
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27 3. Following the mediation of this matter, I again worked with Defendant to update the
putative class list and to determine the actual weeks worked during the class period.
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1 4. The Defendant used its HRIS system and looked for Defendant's non-exempt employees
2 who worked in the state of California during the time period of July 11, 2019 through December
3 13, 2024 ("Class Period"). Once that list was finalized, Defendant reviewed pay records to
4 determine how many weeks these individuals actually worked in California as non-exempt
5 employees during the Class Period.

6 5. That exercise resulted in a finding that there are 109 putative class members who actually
7 worked 10,212 workweeks during the Class Period, and worked 2,578 pay periods during the
8 PAGA period (October 13, 2022 through December 13, 2024).

9 6. Based on the actual workweek count the escalator clause in the Settlement Agreement
10 was not triggered as the actual workweeks of 10,212 is below 10,939.

11 7. Defendant and its counsel are not aware of any actual or potential conflict between them
12 and the administrator for this case.

13 8. Defendant and its counsel is not currently aware of any other class action that has been
14 filed against it that covers any of the claims raised in this lawsuit.

15 I declare under penalty of perjury of the laws of the state of California and the United States
16 that the foregoing is true and correct. Executed this 4th day of April, 2025 in San Diego, California.

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19 JODY LANDRY
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