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Attorneys for Defendants BILLY CHARLES CRAWFORD
AND CODY ALAN CRAWFORD, individuals doing
business as CRAWFORD ASSOCIATES

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE

ROQUE ZARATE JR., individually and
on behalf of all similarly situated
individuals and all “aggrieved employees”
pursuant to Labor Code § 2698 et seq.,

Plaintiff,

v.

BILLY CHARLES CRAWFORD AND
CODY ALAN CRAWFORD, individuals
doing business as CRAWFORD
ASSOCIATES, and DOES 1 through 50,
inclusive,

Defendants.

CASE NO: CVRI2403196

Assigned to the Hon. Harold W. Hopp, Dept. 1

CLASS ACTION

**DECLARATION OF BILLY CHARLES
CRAWFORD IN SUPPORT OF UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

RESERVATION ID: 693136276940

Complaint Filed: June 10, 2024
Assigned for All Purposes to the Hon. Harold W.
Hopp, Dept. 1

1 I, Billy Charles Crawford, declare:

2 1. I am a partner and authorized representative of Crawford Associates and am familiar
3 with those that Crawford Associates employed during the period of August 15, 2020 through
4 present. As such, I can personally and competently attest to the following:

5 2. Based on personnel information collected by Crawford Associates, the average age
6 of those included in the alleged class is 42 years of age.

7 3. Most of the alleged class have attended high school, have a high school diploma, or
8 have the equivalent.

9 4. Most, if not all, of the alleged class members can read and comprehend English;
10 however, some class members' preferred language may be Spanish.

11 I declare under penalty of perjury under the law of the United States that the foregoing is
12 true and correct. Executed this 1st day of April, 2025, in San Diego, California.

13 By: 
14 D78ABA717B2F413
15 Billy Charles Crawford
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