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7 Attorneys for Tyrone James Johnson,
individually and on behalf of all others similarly situated

8 **IN THE SUPERIOR COURT OF CALIFORNIA**

9 **COUNTY OF LOS ANGELES**

10
11 TYRONE JAMES JOHNSON, individually and
on behalf of all others similarly situated

Case No. 24STCV12896

12 Plaintiff,

**DECLARATION OF PLAINTIFF
TYRONE JAMES JOHNSON IN
SUPPORT OF MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

13
14 v.

15 CROWN ENERGY SERVICES, INC.; and
DOES 1 through 100,

16 Defendants.
17

18
19 I, Tyrone James Johnson, declare as follows:

20 1. I am the plaintiff, I am an individual currently residing in California, and I am over the age
21 of 18. The following is based upon my own personal knowledge. If called to testify, I could and
22 would competently testify thereto.

23 2. I have been employed in California by Crown Energy Services, Inc. (hereinafter referred to
24 as "Defendant") since 2017, as a facility technician.

25 3. I initiated my first contact with Frontier Law Center on or about September 2, 2023. I then
26 retained Frontier Law Center to represent me against Defendant for wage and hour claims. I spoke
27 to my lawyers at Frontier Law Center and their staff regularly through the past two years.
28

1 4. I understand that the lawsuit alleges Defendant violated rest break and weekly pay laws. I
2 also understood that the lawsuit alleged that Defendant is liable for wage statement penalties.
3 Finally, I understand that the lawsuit also sought penalties under the Private Attorneys General Act
4 (“PAGA”).

5 5. While I was employed by Defendant, I was required to remain on premises and on duty
6 while on meal and rest breaks because I was subject to random searches. I was also required to go
7 through a security checkpoint before every shift, and then I physically walked to my time clock
8 terminal to clock in; I was not paid for any of this checkpoint or transit time or for any
9 accompanying delays.

10 6. I believed that the policies about which I complained were the same for all Defendant’s
11 hourly employees. I was able to provide documents and to review documents that were produced in
12 this action including personnel files, pay records, and logbooks. I assisted in all aspects of this
13 litigation, including providing information to my attorneys to help them draft informal and formal
14 discovery requests and responses which my attorneys sent on behalf of myself and the putative
15 PAGA members, and attending telephonic conferences in preparation for mediation. I reviewed
16 documents provided to me by my attorneys and spent numerous hours in discussions about this
17 matter with my attorneys at the Frontier Law Center.

18 7. Despite numerous family obligations and work matters, I have spent approximately 30 hours
19 on this case since my initial contact with the lawyers on this matter, over two years ago, and
20 anticipate more time as the PAGA settlement notice will be mailed shortly. I was deposed in person
21 at Defendant’s counsel’s office on December 13, 2024. I have reviewed the settlement papers and
22 the personnel files, pay records, and logbooks that were produced in the litigation and for the
23 mediation session. I was also involved in discussing evidence provided in advance of mediation. I
24 participated in all calls as requested by counsel.

25 8. I made myself available for the mediation on June 26, 2025. I was involved in the settlement
26 negotiations and discussions. I gave my authorization to negotiate, and the parties settled at
27 mediation under the guidance of mediator Hon. Zaven V. Sinanian (Ret.).
28

1 9. I am an adequate representative of the hourly employees. My interests are the same as the
2 other hourly employees, as all employees in the PAGA group were subject to the same policies and
3 procedures at issue in the suit. I also believe my attorneys competently represented the PAGA
4 group. I have always been prepared and willing to remain PAGA representative through trial in this
5 matter, if necessary. I am unaware of any actual or potential conflicts of interest with any Aggrieved
6 Employee or with the Settlement Administrator.

7 10. I also understood that I was acting on behalf of the aggrieved employees and the State of
8 California.

9 11. I believe that the PAGA Action Settlement obtained on behalf of the group of aggrieved
10 employees is excellent in view of the complex and varied issues involved with the case. I took into
11 consideration the strength and weakness of the various claims for all employees and along with my
12 attorneys agreed to the settlement. I was prepared to sit for PAGA trial if necessary. I strongly
13 support the settlement in this matter. When I was contemplating settlement, I always kept the best
14 interests of the PAGA group in mind over my own and I was not willing to settle the matter until I
15 felt it was in the best interest of all aggrieved employees.

16 12. As set forth above, I have been involved with the pleadings, formal discovery, informal
17 discovery, and the settlement negotiations prior to, during, and after the mediation session. I
18 understand many risk factors that were considered and financial issues that were considered when
19 agreeing to the settlement being presented to the Court. I have every reason to believe that the
20 aggrieved employees will be excited about the settlement amount and their respective settlement
21 share. Despite the financial hardship that it would have caused me, I was prepared to sit in trial for
22 up to 2-4 weeks, if necessary.

23 13. Furthermore, it is my opinion that my request for a PAGA representative enhancement in the
24 amount of \$5,000 is fair, reasonable, and adequate. I had legitimate fear that my participation as the
25 lead and sole Plaintiff in this PAGA representative action could result in future issues with
26 Defendant, who is my current employer, or any other employer should I try to work in the same
27 industry in the future. I accepted the potential risk of being liable for the opposing parties' costs if
28 we were unsuccessful in this lawsuit. I do understand that the enhancement amount is not

guaranteed and that the requested amount is fair and reasonable in light of my work experience and the fact that I gave up my right to sue Defendant for any other individual claims by signing a general release.

14. I support my attorneys' request for fees as I believe the fee request of 35% of the gross settlement amount of \$180,000, or \$63,000, to be fair and reasonable in light of the hours spent litigating my case.

15. I also believe that the attorneys' cost request of \$10,705.15, which does not include Settlement Administration Costs, is reasonable in light of the excellent work and favorable result my attorneys achieved for the aggrieved employees. I believe that the attorneys' costs incurred to date from the lawyers retained to represent me and the aggrieved employees are reasonable and necessarily incurred to prosecute this action and achieve this excellent result, including the costs of the mediator. I believe that my attorneys have worked hard to keep costs low and were able to successfully conduct formal and informal discovery to resolve the case.

16. I am not presently aware of any other pending matter or action that this settlement might extinguish or otherwise adversely affect.

17. Therefore I respectfully request the court to approve the PAGA settlement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATED: November 18, 2025

Signed by:

 TYRONE JAMES JOHNSON
 Plaintiff