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14 **SUPERIOR COURT OF STATE OF CALIFORNIA**

15 **COUNTY OF RIVERSIDE**

17 JOHN DEDET and THOMAS SANNER, an
18 individual, and on
19 behalf of all others similarly situated,

20 Plaintiff,

21 v.

22 METAL CONTAINER (MCC) LP, a limited
23 partnership and DOES 1 THROUGH 50,
24 inclusive

25 Defendants.

CASE NO.: **CVRI2405838**

Judge: Hon. Harold W. Hopp
Dept: 1

**DECLARATION OF PLAINTIFF
THOMAS SANNER IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT.**

Date Filed: October 17, 2024
Trial Date: Not set

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1 8. I do not recall receiving any premium pay for the full rest breaks I was not provided
2 an opportunity to take and am informed and believe that my coworkers were not provided
3 premium pay for not being provided with the opportunity to take full, uninterrupted 10-minute
4 rest periods, either.

5 9. Before and during the course of litigation, I was actively involved in assisting my
6 attorneys to support the wage and hour claims asserted. My involvement began before the initial
7 complaint was filed wherein, I provided first-hand knowledge and documentation as to
8 Defendant's practices, their ownership and corporate structure, and their wage and hour policies
9 and practices.

10 10. Part of the information I relayed was with regard to Defendant's timekeeping policies
11 and practices, and their meal and rest period policies and practices.

12 11. I provided them with all the documentation provided to me by Defendant during my
13 employment.

14 12. I assisted in reviewing time and payroll records with my attorneys, and informed
15 them of Defendant's employment policies, and whether those policies matched Defendant's
16 practices.

17 13. My attorneys called me to ask me questions over several times throughout the
18 litigation and I contacted my attorneys several times to stay updated on the case and offer my
19 assistance on any matters I could be helpful with. I was also available for mediation by telephone,
20 during which I was available to be called to answer the questions posed by the mediator regarding
21 the asserted claims, as well as arguments raised by Defendant. In addition, I worked with my
22 attorneys over the next several weeks after mediation to understand and execute a long form
23 settlement agreement.

24 14. Over the past few months since the mediation has been resolved, I have stayed in
25 touch with my attorneys to ensure that there was no undue delay in payment for other class
26 members for whom I brought this Action.

27 15. I believe that, through the present, I have spent at least 27 hours in connection with
28 this matter, which included time spent having preliminary calls with my attorneys; doing an intake

1 with my attorneys; time spent searching for documents relating to my employment; time spent
2 responding to informal discovery; time spent reading and understanding the Settlement
3 Agreement; time spent answering calls to discuss Defendant's timekeeping, pay, meal and rest
4 periods, and to review time and payroll records; time spent discussing with my attorneys
5 Defendant's policies and practices; time spent on-call at mediation; and time spent checking in on
6 the status of the case, among other things. I also spent time preparing this declaration to support
7 Plaintiff's Motion for Preliminary Approval of Class and Representative Action Settlement.

8 16. I feel that by bringing this lawsuit, I could stand up for not only my rights but the
9 rights of other employees who suffered from the same unfair wage practices. I felt that current
10 employees might not want to share their experiences with Defendant since they feared losing their
11 jobs. This is certainly understandable as I, too, have to provide for myself and others.

12 17. By bringing this lawsuit, I have put the interests of the class ahead of my own.

13 18. I understood that I could possibly earn a small enhancement if this case is resolved
14 favorably. I also knew that I could face retaliation from Defendant and backlash from former
15 coworkers who are loyal to Defendant. I have also had to provide a general release of claims to
16 Defendant as part of the settlement. My understanding, in addition, is that if I brought this case
17 individually, I may have earned more compensation individually and on a much quicker timeline
18 than the timeline to resolve this Action.

19 19. My goal in bringing this lawsuit was to obtain a recovery on behalf of the class,
20 and, even more importantly, to put an end to what I believe are illegal practices on the part of
21 Defendant. I believe I have achieved both through this lawsuit and settlement.

22
23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct this 12 day of January 2026, at Los Angeles, California.

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THOMAS SANNER