

Justin F. Marquez (SBN 262417)
 justin@wilshirelawfirm.com
 Christina M. Le (SBN 237697)
 cle@wilshirelawfirm.com
 Zachary Greenberg (SBN 331501)
 Zgreenberg@wilshirelawfirm.com
WILSHIRE LAW FIRM
 3055 Wilshire Blvd., 12th Floor
 Los Angeles, California 90010
 Telephone: (213) 381-9988
 Facsimile: (213) 381-9989

Attorneys for Plaintiffs Matt Martell and Edward
 Cosico

[Additional Counsel on following page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

Coordination Proceeding
 Special Title (Rule 3.550)
Black & Decker Wage and Hour Cases
 Included Actions:

Mancillas v. Stanley Black & Decker, Inc.

*Cosico and Martell v. Stanley Black & Decker,
 Inc., et al.*

Judicial Council Coordination Proceeding Case
 No. **JCCP 5218**

[Hon. David S. Cohn]

**DECLARATION OF PLAINTIFF EDWARD
 COSICO**

*[Filed with the Notice of Motion and Motion for
 Preliminary Approval, Declaration of Kane
 Moon, Declaration of Plaintiff Paul Mancillas,
 Declaration of Plaintiff Matt Martell, and
 [Proposed] Order]*

SUPERIOR COURT OF CALIFORNIA
 COUNTY OF SAN BERNARDINO
 NO. CIVSB2123358

SUPERIOR COURT OF CALIFORNIA
 COUNTY OF ALAMEDA
 NO. 21CV002218

PRELIMINARY APPROVAL HEARING

Date: January 30, 2023

Time: 10:00 AM

Dept: S26

Complaint Filed: August 30, 2021
 Trial Date: Not set

ADDITIONAL COUNSEL

Kane Moon (SBN 249857)
kane.moon@moonyanglaw.com
Allen Feghali (SBN 301080)
allen.feghali@moonyanglaw.com
Edwin Kamarzarian (SBN 327830)
edwin.kamarzarian@moonyanglaw.com
MOON & YANG, APC
1055 W. Seventh St., Suite 1880
Los Angeles, California 90017
Telephone: (213) 232-3128
Facsimile: (213) 232-3125

Attorneys for Plaintiff Paul Mancillas

1 7. As a result, I believe that other employees and I were harmed.

2 TYPICALITY AND ADEQUACY

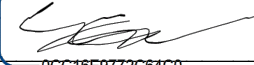
3 8. During the alleged class period, I was employed by Defendant in a non-exempt position.
4 Accordingly, I have brought this class action case on behalf of all other employees who are also or were
5 at some point classified as non-exempt during their employment with Defendant. I believe my alleged
6 claims in this case impacted not only me but the entire class.

7 9. I believe that I have no conflicts of interest with other class members and have agreed to
8 place Class interests above my own.

9 10. I have reviewed and consent to my attorneys' fee split agreement with Moon & Yang,
10 APC.

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

13 Executed this 1/4/2023, at 1/4/2023, California.

14
15 DocuSigned by:
16 
17 _____
18 Edward Cosico
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1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am employed in the county of Los Angeles, State of California. I am over the age of 18
4 and not a party to the within action; my business address is 1055 W. Seventh St., Suite 1880, Los
Angeles, California 90017. On **January 6, 2023**, I served the foregoing document described as:

5 **DECLARATION OF PLAINTIFF EDWARD COSICO**

6 X by placing ___ the original X a true copy thereof enclosed in sealed envelope(s)
7 addressed as follows:

8 Amanda C. Sommerfeld
asommerfeld@jonesday.com
9 Jennifer A. Wilson
jawilson@jonesday.com
JONES DAY
10 555 South Flower Street, Fiftieth Floor
Los Angeles, CA 90071.2452
11 Telephone: +1.213.489.3939
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Aileen H. Kim
aileenkim@jonesday.com
JONES DAY
3161 Michelson Drive, Suite 800
Irvine, CA 92612
Telephone: +1.949.851.3939
Facsimile: +1.949.553.7539

13 ***Attorney for Defendant STANLEY BLACK & DECKER, INC. and STANLEY
CONVERGENT SECURITY SOLUTIONS, INC.***

14 Justin F. Marquez
justin@wilshirelawfirm.com
15 Christina M. Le
CLe@wilshirelawfirm.com
16 Zachary D. Greenberg
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18 Los Angeles, California 90010
Tel: (213) 381-9988
19 Fax: (213) 381-9989

20 ***Attorneys for Plaintiffs***
21 ***EDWARD COSICO and MATTHEW MARTELL***

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23 envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with
24 the firm's practice of collection and processing correspondence for mailing. Under
25 that practice it would be deposited with U.S. postal service on that same day with
26 postage thereon fully prepaid at Los Angeles, California in the ordinary course of
business. I am aware that on motion of the party served, service is presumed invalid
if postal cancellation date is more than one day after date of
deposit for mailing in affidavit....

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

Executed this, **January 6, 2023** at Los Angeles, California.

Janelle Jickain
Type or Print Name


Signature

Justin F. Marquez (SBN 262417)
justin@wilshirelawfirm.com
Christina M. Le (SBN 237697)
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Attorneys for Plaintiffs Matt Martell and Edward Cosico

[Additional Counsel on following page]

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No. **JCCP 5218**

[Hon. David S. Cohn]

DECLARATION OF PLAINTIFF MATT MARTELL

[Filed with the Notice of Motion and Motion for Preliminary Approval, Declaration of Kane Moon, Declaration of Plaintiff Paul Mancillas, Declaration of Plaintiff Edward Cosico, and [Proposed] Order]

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
NO. CIVSB2123358

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COUNTY OF ALAMEDA
NO. 21CV002218

PRELIMINARY APPROVAL HEARING

Date: January 30, 2023

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ADDITIONAL COUNSEL

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kane.moon@moonyanglaw.com
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Edwin Kamarzarian (SBN 327830)
edwin.kamarzarian@moonyanglaw.com
MOON & YANG, APC
1055 W. Seventh St., Suite 1880
Los Angeles, California 90017
Telephone: (213) 232-3128
Facsimile: (213) 232-3125

Attorneys for Plaintiff Paul Mancillas

DECLARATION OF MATT MARTELL

I, MATT MARTELL, declare as follows:

1. I am a named Plaintiff in this case. I am a former employee of Defendant Stanley Convergent Security Solutions, Inc. (“Defendant”), which I understand used to be a subsidiary of Defendant Stanley Black & Decker, Inc. until approximately July 2022, when Defendant was acquired by Securitas where I am now employed. As such, I have personal knowledge of, or am informed and believe, the following facts. If called as a witness, I could and would testify competently to the following:

BACKGROUND OF EMPLOYMENT

2. In or around December 2019, I was hired as a Service Technician III out of Defendant's office in Fremont, California.

3. Throughout my employment with Defendant, I have typically worked five days each workweek and roughly eight or more hours each workday.

4. During the alleged class period, I believe that Defendant's wage and hour practices placed employees, including me, at a disadvantage. For instance, I believe I was not paid based on the actual hours I always worked or paid according to the appropriate rates of pay, and I was sometimes paid extra, but I believe that pay was not reflected in my overtime and sick pay. Furthermore, during the alleged class period, I believe I did not receive all of my meal and rest periods, nor was I paid all premiums owed to me for all missed meal and rest periods.

COMMONALITY AND PREDOMINANCE

5. I believe that Defendant's wage and hour practices that affected me also affected all of their hourly employees. For instance, believe I the practice of not paying for all hours worked was common among all employees, including those who worked out of the same location and area that I worked during the alleged class period.

6. I believe that other persons who worked out of the same location that I worked during the alleged class period were also not paid the appropriate rates of pay, they received bonus and other compensation not reflected in their overtime and sick pay, and they did not receive all meal or rest periods, nor were they paid all premiums owed to them.

1 7. As a result, I believe that other employees and I were harmed.

2 TYPICALITY AND ADEQUACY

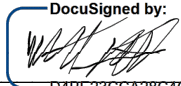
3 8. During the alleged class period, I was employed by Defendant in a non-exempt position.
4 Accordingly, I have brought this class action case on behalf of all other employees who are also or were
5 at some point classified as non-exempt during their employment with Defendants. I believe my alleged
6 claims in this case impacted not only me but the entire class.

7 9. I believe that I have no conflicts of interest with other class members and have agreed to
8 place Class interests above my own.

9 10. I have reviewed and consent to my attorneys' fee split agreement with Moon & Yang,
10 APC.

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

13 Executed this 1/4/2023, at Brentwood, California.

14 DocuSigned by:
15 
16 D4BE23CCA28C4CC...
17 Matt Martell
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1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am employed in the county of Los Angeles, State of California. I am over the age of 18
4 and not a party to the within action; my business address is 1055 W. Seventh St., Suite 1880, Los
Angeles, California 90017. On **January 6, 2023**, I served the foregoing document described as:

5 **DECLARATION OF PLAINTIFF MATT MARTELL**

6 X by placing ___ the original X a true copy thereof enclosed in sealed envelope(s)
7 addressed as follows:

8 Amanda C. Sommerfeld
asommerfeld@jonesday.com
9 Jennifer A. Wilson
jawilson@jonesday.com
JONES DAY
10 555 South Flower Street, Fiftieth Floor
Los Angeles, CA 90071.2452
11 Telephone: +1.213.489.3939
12 Facsimile: +1.213.243.2539

Aileen H. Kim
aileenkim@jonesday.com
JONES DAY
3161 Michelson Drive, Suite 800
Irvine, CA 92612
Telephone: +1.949.851.3939
Facsimile: +1.949.553.7539

13 ***Attorney for Defendant STANLEY BLACK & DECKER, INC. and STANLEY
CONVERGENT SECURITY SOLUTIONS, INC.***

14 Justin F. Marquez
justin@wilshirelawfirm.com
15 Christina M. Le
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20 ***Attorneys for Plaintiffs***
21 ***EDWARD COSICO and MATTHEW MARTELL***

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if postal cancellation date or postage meter date is more than one day after date of
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28 foregoing is true and correct.

Executed this, **January 6, 2023** at Los Angeles, California.

Janelle Jickain
Type or Print Name


Signature

Kane Moon (SBN 249834)
kane.moon@moonyanglaw.com
Allen Feghali (SBN 301080)
allen.feghali@moonyanglaw.com
Edwin Kamarzarian (SBN 327830)
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Attorneys for Plaintiff Paul Mancillas

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No. **JCCP 5218**

[Hon. David S. Cohn]

**DECLARATION OF PLAINTIFF PAUL
MANCILLIAS**

[Filed with the Notice of Motion and Motion for Preliminary Approval, Declaration of Kane Moon, Declaration of Plaintiff Matt Martell, Declaration of Plaintiff Edward Cosico, and [Proposed] Order]

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
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SUPERIOR COURT OF CALIFORNIA
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NO. 21CV002218

PRELIMINARY APPROVAL HEARING

Date: January 30, 2023

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Dept: S26

Complaint Filed: August 30, 2021

Trial Date: Not set

ADDITIONAL COUNSEL

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justin@wilshirelawfirm.com
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Los Angeles, California 90010
Telephone: (213) 381-9988
Facsimile: (213) 381-9989

Attorneys for Plaintiffs Matt Martell and Edward Cosico

DECLARATION OF PAUL MANCILLIAS

I, PAUL MANCILLIAS, declare as follows:

1. I am a named Plaintiff in this case. I am a former employee of Black and Decker (U.S. Inc.) (“BDU”), which I understand is a subsidiary of Defendant Stanley Black Decker, Inc. As such, I have personal knowledge of, or am informed and believe, the following facts. If called as a witness, I could and would testify competently to the following:

BACKGROUND OF EMPLOYMENT

2. I worked for BDU as a machine operator from approximately October 2016 to November 2020. Throughout my employment, I typically worked five days each workweek and roughly eight or more hours each workday.

3. During my employment with BDU, I believe that its wage and hour practices placed employees, including me, at a disadvantage. For instance, I believe I was not paid based on the actual hours I worked, and I was sometimes paid additional remunerations, but I believe that pay was not reflected in my overtime and sick pay. Furthermore, during my employment for BDU, I believe I was not informed of any policies regarding rest breaks and meal periods. Also, I believe I was required to purchase gloves, boots, safety glasses, and other miscellaneous items for work purposes without reimbursement.

COMMONALITY AND PREDOMINANCE

4. I believe that BDU's wage and hour practices that affected me also affected all of their hourly employees. For instance, I believe the practice of not paying for all hours worked was common among all employees, including those who worked in the field.

5. I believe that other persons who worked at the same location that I worked, but during different shifts and on different days, were not informed of meal and rest breaks policies, nor were they reimbursed for their purchases of gloves, boots, safety glasses, and other work-related items.

6. As a result, other employees and I were harmed.

TYPICALITY AND ADEQUACY

7. I was employed by BDU in a non-exempt position during the alleged class period.

Accordingly, I have brought this class action case on behalf of all other employees who are also or were

1 at some point classified as non-exempt during their employment with BDU. I believe my alleged claims
2 in this case impacted not only me but the entire class.

3 8. I believe that I have no conflicts of interest with other class members and have agreed to
4 place Class interests above my own.

5 9. I have reviewed and consent to my attorneys' fee split agreement with the Wilshire Law
6 Firm.

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

1/6/2023

9 Executed this _____, at San Bernardino, California.

DocuSigned by:



DEDF3C5B115742C...

Paul Mancillias

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

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Irvine, CA 92612
Telephone: +1.949.851.3939
Facsimile: +1.949.553.7539

13 ***Attorney for Defendant STANLEY BLACK & DECKER, INC. and STANLEY
CONVERGENT SECURITY SOLUTIONS, INC.***

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Janelle Jickain
Type or Print Name


Signature