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 10 Attorneys for Plaintiff,
 11 KAREEM WILSON, and all others similarly situated
 12 (additional attorneys listed on next page)

13 **UNITED STATES DISTRICT COURT**
 14 **CENTRAL DISTRICT OF CALIFORNIA**
 15 **WESTERN DIVISION**

16 KAREEM WILSON, on behalf of
 17 himself, and all others similarly
 18 situated, and as an “aggrieved
 19 employee” on behalf of other
 20 “aggrieved employees” under the
 21 Labor Code Private Attorneys General
 22 Act of 2004

23 Plaintiff(s),

24 v.

25 J.B. HUNT LOGISTICS, INC.,
 26 an Arkansas corporation;
 27 J.B. HUNT TRANSPORT, INC.,
 a business entity of unknown form; and
 DOES 1 through 50, inclusive

Defendant(s).

Case No. 2:18-cv-3487-SVW-AFMx

**DECLARATION OF KAREEM
 WILSON IN SUPPORT OF
 PLAINTIFF’S RENEWED
 UNOPPOSED MOTION FOR
 PRELIMINARY APPROVAL OF
 CLASS ACTION SETTLEMENT**

Action filed: March 2, 2018
 Hearing Date: April 5, 2021
 Hearing Time: 1:30 P.M.
 Hearing Court: 10A, Hon. Stephen
 V. Wilson



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ADDITIONAL ATTORNEY FOR PLAINTIFF

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DECLARATION OF KAREEM WILSON

I, KAREEM WILSON, declare as follows:

1. I am the named Plaintiff in this action and am represented by David Spivak of The Spivak Law Firm and Walter Haines of United Employees Law Group. Except as otherwise indicated, I have personal knowledge of all matters set forth herein and, if called upon as a witness, could and would competently testify thereto under oath.

2. I understand that, as class representative, I have certain duties and responsibilities to the Class and believe that I have fairly represented the interests of all Class Members during the entire course of this case.

3. My counsel provided me with information regarding class actions, how they work, and what my duties would be as the class representative. I agreed to serve as a class representative so that I could seek to recover wages and penalties on behalf of myself and other employees like me.

4. I understand that my attorneys are submitting an application to this Court for a Class Representative General Release Payment to compensate me for my unique contributions to the success of this action and in consideration for providing Defendants a general release that is broader than the claims released by Participating Class Members in the amount of \$7,500. This amount is only about 7.5% of the Gross Settlement Amount of \$100,000. I believe this amount is fair and reasonable compensation for my efforts in this case and the risks I have taken in pursuing a fair recovery for the Class.

5. I have provided Defendants with a complete and general release of any and all claims, known or unknown, I may have against Defendants. By agreeing to settle the case in the best interest of the Class Members, I have given up the right to pursue individual claims for unpaid wages, unpaid meal period and rest period premium wages, and penalties and recover substantially more in unpaid wages and unpaid meal period and rest period premium wages, interest, waiting time penalties,



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1 pay stub penalties, and civil penalties. I did not seek an individual settlement for
2 my claims at all, instead choosing to prosecute this matter on behalf of my
3 coworkers. By pursuing the claims of all Class Members, I have also rendered my
4 own individual payment uncertain and delayed its payment by several months (at
5 the least).

6 6. As a class representative, I agreed to (1) consider the interests of the
7 Class just as I would consider my own interests and, in some cases, to put the
8 interests of the Class before my own; (2) actively participate in the lawsuit, as
9 necessary, by among other things, answering interrogatories, producing documents
10 to Defendants and giving depositions and trial testimony; (3) travel to give such
11 testimony; (4) recognize and accept that any resolution of the lawsuit by dismissal
12 or settlement is subject to court approval and must be designed in the best interest
13 of the Class as a whole; and (5) follow the progress of the lawsuit and provide all
14 relevant facts to Class Counsel. I agreed to shoulder all of these responsibilities in
15 exchange for a proportionate share of funds made available for distribution to the
16 Class. I had no guarantee of a Class Representative General Release Payment.
17 Including travel time, I have spent over 66.25 hours of my time in connection with
18 this case to date. Attached as **Exhibit A** to this declaration is a true and correct
19 copy of an activity log I have prepared showing the estimates of time I spent on
20 various work performed in this case. The activities I have performed have included,
21 but have not been limited to: obtaining legal counsel, speaking with my legal
22 counsel on numerous occasions, over the phone, informing them of the terms and
23 conditions of my coworkers' employment, assisting them in gathering information,
24 identifying the claims brought in this case, gathering contact information for my
25 former coworkers, contacting class members about the lawsuit to arrange their
26 communications with my attorneys, gathering documents from my employment
27 with Defendants, foregoing pursuit of my individual claims in favor of a fair class-
wide resolution, and being actively involved in the settlement process to ensure a



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1 fair result for the Class as a whole. I have also spent time carefully reviewing the
2 Settlement, and other case related documents on my own and with my counsel to
3 make sure that the Settlement and other work my attorneys performed are in the
4 best interest of the Class Members. I will regularly contacted my counsel to follow
5 the progress of the case and anticipate spending several additional hours of my time
6 in connection with this case after the Court grants preliminary approval of the
7 Settlement.

8 7. My counsel have advised me that because my employment ended
9 before the close of the Class Period, there might be absent class members who will
10 have worked more workweeks during the Class Period than I have and, as a result,
11 receive larger shares in the recovery. While this is a risk that I assumed when I
12 brought the lawsuit, it seems unfair to limit my recovery to the amount of an absent
13 class member.

14 8. Further, my counsel have advised me of the possibility that, if the case
15 was lost, I could have been ordered to pay Defendants’ costs and even attorney’s
16 fees in this case, which could have been thousands of dollars by the end.

17 9. Because I filed this lawsuit, there is a public record at the Court
18 showing that I brought a class action for unpaid wages and penalties against my
19 former employer. A Class Representative General Release Payment to me of
20 \$7,500 is not equal to the harm to my future career prospects that this case may
21 cause me.

22 10. Based on the time, risk, stigma, loss of benefits and income and great
23 outcome of this case, I believe that the requested Class Representative General
24 Release Payment for me is fair and reasonable. As such, I respectfully request that
25 the Court grant the requested Class Representative General Release Payment of
26 \$7,500.

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I declare under the penalty of perjury of the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on January 26, 2020 in Woodland Hills, California.



KAREEM WILSON,
Declarant



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EXHIBIT A

Approximate Date	Please select one:	Hours
8/7/2017	Reviewing documents: Other docs from law firm	0.58
11/28/2017	Calls and/or texts with law firm	0.50
12/6/2017	Emails to/from law firm	0.50
12/7/2017	Reviewing documents: Retainer/FAQ	1.00
12/12/2017	Emails to/from law firm	0.33
12/12/2017	Calls and/or texts with law firm	0.33
12/16/2017	Emails to/from law firm	0.17
12/23/2017	Gathering information and/or documents	2.00
12/27/2017	Gathering information and/or documents	1.50
1/8/2018	Gathering information and/or documents	1.50
1/19/2018	Reviewing documents: Retainer/FAQ	1.50
1/27/2018	Gathering information and/or documents	2.67
2/5/2018	Reviewing documents: Other docs from law firm	4.00
2/6/2018	Reviewing documents: Complaint	1.00
2/14/2018	Reviewing documents: Complaint	0.58
2/15/2018	Gathering information and/or documents	1.92
3/13/2018	Reviewing documents: Complaint	1.00
3/15/2018	Calls and/or texts with law firm	0.17
3/26/2018	Contacting witness(es)	2.17
3/27/2018	Emails to/from law firm	0.92
4/11/2018	Contacting witness(es)	1.75
4/24/2018	Contacting witness(es)	2.25
5/4/2018	Reviewing documents: Other docs from law firm	0.33
5/10/2018	Gathering information and/or documents	0.75
5/10/2018	Contacting witness(es)	2.58
5/18/2018	Reviewing documents: Other docs from law firm	0.25
5/21/2018	Emails to/from law firm	0.25
5/21/2018	Calls and/or texts with law firm	0.17
5/23/2018	Calls and/or texts with law firm	0.08
5/24/2018	Reviewing documents: Other docs from law firm	0.25
5/30/2018	Reviewing documents: Other docs from law firm	0.33
4/22/2019	Emails to/from law firm	0.25
5/6/2019	Gathering information and/or documents	1.17
5/7/2019	Calls and/or texts with law firm	0.17
6/19/2019	Contacting witness(es)	0.58
6/26/2019	Gathering information and/or documents	1.08
7/11/2019	Gathering information and/or documents	2.33
8/14/2019	Gathering information and/or documents	1.33
8/20/2019	Contacting witness(es)	1.83
8/30/2019	Contacting witness(es)	1.58
9/5/2019	Gathering information and/or documents	1.42
9/20/2019	Gathering information and/or documents	1.83
9/23/2019	Calls and/or texts with law firm	0.17
9/23/2019	Emails to/from law firm	1.50
9/25/2019	Calls and/or texts with law firm	0.17
9/26/2019	Calls and/or texts with law firm	1.42
9/26/2019	Emails to/from law firm	0.25
9/27/2019	Emails to/from law firm	0.25
9/27/2019	Mediation: travel time to/from	2.67

9/27/2019	Mediation: participation time	8.00
3/31/2020	Emails to/from law firm	0.17
6/11/2020	Emails to/from law firm	0.33
6/11/2020	Reviewing documents: Settlement Agreement	1.00
7/29/2020	Emails to/from law firm	2.00
9/1/2020	Emails to/from law firm	0.17
1/22/2021	Reviewing documents: Other docs from law firm	0.75
1/22/2021	Calls and/or texts with law firm	0.33
1/25/2021	Calls and/or texts with law firm	0.17
	Total:	66.25