

1 R. Rex Parris (SBN 96567)
rrparris@parrislawyers.com
2 Alexander R. Wheeler (SBN 239541)
awheeler@parrislawyers.com
3 Kitty K. Szeto (SBN 258136)
kszeto@parrislawyers.com
4 Ryan A. Crist (SBN 316653)
rcrist@parrislawyers.com

5 **PARRIS LAW FIRM**
43364 10th Street West
6 Lancaster, California 93534
Telephone: (661) 949-2595
7 Facsimile: (661) 949-7524

8 Attorneys for Plaintiff and the Putative Class
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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
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15 CHRISTINE CRUMP, individually,
16 and on behalf of other members of the
17 general public similarly situated and on
18 behalf of other aggrieved employees
pursuant to the California Private
Attorneys General Act;

19 Plaintiff,

20 v.

21 HYATT CORPORATION, an unknown
22 business entity; and DOES 1 through
23 100, inclusive,

24 Defendants.
25

Case No. 4:20-cv-00295-HSG

CLASS ACTION

**DECLARATION OF CHRISTINE CRUMP
IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: June 2, 2022
Time: 2:00 p.m.
Courtroom: 2

1 I, Christine Crump, declare as follows:

2 1. I am over eighteen years of age and a resident of Oakland in the State of
3 California. I have personal knowledge of the facts and statements set forth in this
4 declaration, and if called upon to testify, I could and would competently testify thereto.

5 2. I worked for Defendant Hyatt Corporation (“Hyatt”) as an hourly-paid
6 employee from January 2019 to June 2019.

7 3. During my entire employment with Hyatt, I worked as a Line Cook at the
8 Hyatt House located in Emeryville, California. During my employment, Hyatt
9 maintained a timekeeping policy that rounded our time as opposed to paying us minute
10 by minute.

11 4. Once I determined that I may have been paid improperly, I sought out
12 attorneys to help me and hired my attorneys at the Parris Law Firm. In preparation for
13 my initial communication with my lawyers, I gathered documents and other pertinent
14 information. I spent at least 5 hours discussing the case with my attorneys.

15 5. After thoroughly discussing the issue with the attorneys, I decided to file a
16 class action lawsuit against Hyatt on behalf of all hourly employees. During this initial
17 investigatory stage, I spent at least 10 hours within the first month gathering information
18 from co-workers and discussing the case with my attorneys.

19 6. Since the filing of the initial class action complaint and throughout the
20 length of this case, I have spent a considerable amount of time helping to push it along as
21 the lead Plaintiff. I spent at least 3 hours on the telephone with my attorneys providing
22 them information to be included in the complaint and answering any questions that they
23 had regarding my job. After I decided to pursue a case on behalf of myself and a class of
24 hourly employees, the case went on for a while with Hyatt fighting tooth and nail on all
25 of the claims made in the lawsuit, including my individual claims.

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1 7. The time that I have spent assisting my attorneys in pursuing this case has
2 been extensive. I spent at least 10 hours during the first 2 weeks after my initial
3 discussions with my attorneys speaking further with my attorneys and their staff, going
4 over my experience working at Hyatt, why I wanted to pursue a case, and all of the duties
5 that I would have as a class representative.

6 8. Since deciding to pursue a case, I have been in frequent contact with my
7 attorneys and their staff making sure that I was updated on the lawsuit and providing
8 them with any new information that I obtained. I spent at least 5 hours on these activities
9 alone. I also spoke frequently on the telephone with my attorneys to help investigate the
10 case almost daily during the first two months of the case.

11 9. Additionally, throughout the litigation, I was repeatedly called by my
12 attorneys to discuss all aspects of the case and the claims as the litigation developed. I
13 spent approximately 5 hours discussing and answering my attorneys' questions
14 concerning the job duties of the employees, the employment policies and procedures of
15 Hyatt, the names and contact information of former employees, hours worked, and what
16 documents may be available.

17 10. Over the course of this case, I spent over 25 hours communicating with my
18 attorneys.

19 11. I was also very involved with the discovery process in this case. I assisted
20 my attorneys in responding to written discovery that Hyatt served on me. It took me at
21 least 3 hours to review these questions and at least 2 hours on the telephone with my
22 attorneys responding to them. I also spent days looking for documents in response to
23 Hyatt's document requests.

24 12. Throughout this litigation, I personally located and produced documents to
25 my attorneys to assist in the prosecution of this case.

26 13. As the lead Plaintiff in this case, I had my deposition taken by Hyatt on
27 March 2, 2021. I spent approximately 10 hours preparing for the depositions with my
28 attorney. The deposition itself lasted all day.

1 14. I was also available by telephone when it came time for the mediation and
2 for the settlement discussions. I spent approximately 3 hours discussing the settlement
3 with my attorneys. Once the settlement was reached, I spent another 3 hours reading the
4 terms of the memorandum of understanding, the long-form settlement agreement, and
5 this declaration, and another 3 hours discussing everything with my attorneys.

6 15. During the entire case, I have been responsive to my attorneys' requests and
7 believe that my efforts in obtaining information were very helpful in obtaining the result
8 that was achieved. Accordingly, I respectfully request that the Court award me, as the
9 Class Representative who filed this lawsuit and obtained this settlement on behalf of all
10 of the class members, an enhancement in the amount of \$10,000. As detailed above, I
11 believe that this amount is reasonable considering the time and effort I have personally
12 spent pursuing this case on behalf of the entire class and the risks that I undertook in
13 pursuing the case against my employer and one of the largest hotel chains in the nation.
14 This is especially risky for me because if I were to ever look for another hotel job, any
15 prospective employer can easily find out about this lawsuit, and they most likely would
16 not hire anyone who has sued a former employer.

17 16. I also have individual claims that I will be releasing as part of this settlement
18 and will no longer be able to pursue. I believe that the damages for my individual claims
19 which I am giving up as part of this settlement exceed \$10,000. I have signed a general
20 release with Hyatt giving up my rights to pursue any and all claims as part of this
21 settlement, which is something that the other class members will not have to do. I believe
22 that an enhancement award in the amount of \$10,000 is fair and reasonable because I am
23 giving up additional rights that the other class members do not have to give up.

24 17. I have not entered into any undisclosed agreements nor have I received any
25 undisclosed compensation in this case. The only compensation I will receive is whatever
26 the amount the Court approves as an enhancement award, as well as my share as a class
27 member of the settlement fund.

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18. I am not related to anyone at the Parris Law Firm.

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

Executed on 2/6/2022 at Oakland, California.

DocuSigned by:

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Christine Crump