


5/31/19


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14 CHERYL FILLEKES &
OPT-IN PLAINTIFFS
15

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18

19 ROBERT HEATH, on behalf of himself
20 and

21 CHERYL FILLEKES, on behalf of herself and
others similarly situated,

22 Plaintiffs,

23 v.

24 GOOGLE LLC, a Delaware limited liability
25 company,

26 Defendant.
27
28

Case No. 5:15-cv-01824-BLF

**DECLARATION OF PLAINTIFF CHERYL
FILLEKES IN SUPPORT OF JOINT
MOTION FOR FINAL APPROVAL OF
COLLECTIVE ACTION SETTLEMENT
AGREEMENT**

Complaint Filed: April 22, 2015

Case No. 5:15-cv-01824-BLF

DECLARATION OF PLAINTIFF CHERYL FILLEKES

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2 **DECLARATION OF PLAINTIFF CHERYL FILLEKES IN SUPPORT OF**
3 **JOINT MOTION FOR FINAL APPROVAL OF COLLECTIVE ACTION**
4 **SETTLEMENT AGREEMENT**

5 Cheryl Fillekes deposes and states as follows:

- 6 1. I am the Named Plaintiff in the above-captioned lawsuit and have served as the class
7 representative since being added as a plaintiff in the First Amended Complaint on June 25,
8 2015. *See* Am. Compl. (Dkt. #18). I am over the age of eighteen and have personal knowledge
9 of the matters stated herein.
- 10 2. Since June 2015, I have been actively involved in the litigation, and estimate that I have spent
11 approximately 250 hours in pursuit of this litigation. My efforts have included the following:
- 12 • Assisting with the preparation of the Amended Complaint and other filings, including,
13 for example, Plaintiffs' Motion for Conditional Certification of Collective Action
14 (Dkt. #75);
 - 15 • Traveling from St. Johnsville, New York to San Francisco, California to prepare for
16 and sit for a full-day deposition on December 17, 2015 and continuing the deposition
17 by telephone on February 12, 2016;
 - 18 • Reviewing the transcripts of my deposition testimony for any inaccuracies and
19 correcting such inaccuracies;
 - 20 • Responding to written discovery requests from Defendant, which included one set of
21 document requests (consisting of 44 requests) and two sets of interrogatories
22 (consisting of 15 total interrogatories);
 - 23 • Gathering and producing documents and ESI for use in connection with the case;
 - 24 • Regularly reviewing pleadings, correspondence and other documentation received
25 from counsel in order to stay apprised of the progress of the litigation;
 - 26 • Traveling from St. Johnsville, New York to San Francisco, California for an in-person
27 mediation on December 19, 2017 and being actively involved in subsequent
28 settlement discussions; and
 - Reviewing and approving the terms of the collective action settlement agreement.

24 I declare under penalty of perjury that the foregoing is true and correct to the best of my
25 knowledge.

26 Dated: May 31, 2019


Cheryl Fillekes