

CONSENT TO BECOME PARTY PLAINTIFF IN
COLLECTIVE ACTION UNDER 29 U.S.C. § 216(b)

Cahill et al. v. Nike, Inc.

United States District Court for the District of Oregon
Case No. _____

1. I, Sara Johnston, consent to be a party plaintiff in the above-listed action under 29 U.S.C. § 216(b), and agree to be bound by any settlement or judgment of the Court in the action.

2. I worked for Defendant Nike, Inc. in and around Beaverton, Oregon from June 2008 through November 2017 first as a Swim Instructor, then as an Account Service Representative, then a Junior Business Systems Analyst (“BSA”), and finally as an Intermediate BSA.

3. During my time at Nike, I was paid less than male Nike employees for substantially equal work. When I was initially hired at Nike as an Account Service Representative, my annual salary was \$33,000. I tried to negotiate a higher salary at hire, but Nike told me that it does not negotiate starting salary. However, about two months after I was hired, Nike hired a man into the same role on my Team, and his starting annual salary was \$35,000. On information and belief, he was able to negotiate a higher starting salary even though I had more relevant experience and higher-level credentials. He had no idea how to do the job and I had to train him, but he was paid more than I was.

4. When I was an Intermediate BSA, I performed work in “stretch roles,” in which I performed duties as a Tableau Developer and a Product Owner in addition to my BSA responsibilities. For my work as a Tableau Developer, I should have been promoted to Application Engineer, which position I am informed and believe earned between \$85,000 and \$135,000. As a Product Owner, I should have been promoted Lead or Senior BSA, which positions were in the higher U-Band pay level. I never received these promotions despite doing the work required of these positions and was only making \$75,000 per year when I left Nike in 2017.

5. Shortly after I left the company, Nike split my position into two roles, hired men

into both of those roles, and placed both of those men into the higher U-Band pay level, whereas I had remained in the lower L-Band level throughout my time there. On information and belief, the male employees were paid at a higher rate for the same work in the U-Band level than I had been paid in the L-Band level.

6. I authorize Plaintiffs' counsel to file this consent with the Clerk of the Court.

7. Upon consideration of my rights with respect to my legal representation, I hereby authorize the named Plaintiffs' counsel (Goldstein, Borgen, Dardarian & Ho; Ackermann & Tilajef PC; India Lin Bodien Law; and Markowitz Herbold PC) to make decisions with respect to the conduct and handling of this action, including the settlement thereof, as they deem appropriate or necessary.

Please type or print in ink the following:

Name: Sara Renee Johnston
Address: [REDACTED]
Beaverton OR 97006
(City) (State) (Zip)
Email: [REDACTED]
Tel: [REDACTED] [REDACTED]
(Day) (Evening)

Date: 8/9/2018 9:18:05 AM PDT

DocuSigned by:
[Signature]
Signature
3B8F5B845CAA43A...