

MAYALL HURLEY P.C.
ROBERT J. WASSERMAN (SBN: 258538)
rwasserman@mayallaw.com
WILLIAM J. GORHAM (SBN: 151773)
wgorham@mayallaw.com
VLADIMIR J. KOZINA (SBN: 284645)
vjkozina@mayallaw.com
2453 Grand Canal Boulevard
Stockton, California 95207-8253
Telephone: (209) 477-3833
Website: www.mayallaw.com

Attorneys for Plaintiffs and the Putative Class

(Additional counsel for Plaintiffs Listed on Signature Page)

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CURTIS MARKSON, MARK
MCGEORGE, CLOIS MCCLENDON,
and ERIC CLARK, individually and on
behalf of all others similarly situated,

Plaintiffs,

vs.

CRST INTERNATIONAL, INC., CRST
EXPEDITED, INC.; C.R. ENGLAND,
INC., WESTERN EXPRESS, INC.,
SCHNEIDER NATIONAL CARRIERS,
INC., SOUTHERN REFRIGERATED
TRANSPORT, INC., COVENANT
TRANSPORT, INC., PASCHALL
TRUCK LINES, INC., STEVENS
TRANSPORT, INC., and DOES 1-10,
inclusive,

Defendants.

CASE NO.: 5:17-cv-01261-SB (SPx)

**DECLARATION OF ERIC CLARK IN
SUPPORT OF PLAINTIFFS’
MOTION FOR ATTORNEYS’ FEES
AND COSTS**

Judge: Hon. Stanley Blumenfeld, Jr.
Date: July 29, 2022
Time: 8:30 a.m.
Location: Courtroom 6C
350 West 1st Street
Los Angeles, CA 90012

Discovery Cutoff Date: 7/2/2021
Pretrial Conference Date: TBD
Trial Date: TBD

1 I, Eric Clark, declare as follows:

2 1. The facts set forth herein are true of my own personal knowledge, and if
3 called upon to testify thereto, I could and would competently do so under oath.

4 2. I am one of the four named Plaintiffs in this action.

5 3. Throughout this case, I have understood and appreciated my role and
6 responsibilities as a class representative. I have understood that it is my responsibility
7 to look out for the best interests of all class members and to not put my own interests
8 ahead of theirs. I have willingly and knowingly accepted these responsibilities and
9 have carried them out to the best of my ability.

10 4. In 2017, prior to bringing this lawsuit, I interviewed attorneys and
11 ultimately selected Mayall Hurley, P.C., Ackermann & Tilajef, P.C., and Melmed Law
12 Group P.C. to represent myself and the Class. It is my understanding that Mayall
13 Hurley, P.C., Ackermann & Tilajef, P.C. and Melmed Law Group, P.C. are experienced
14 in litigating class actions.

15 5. In or around June 2018, I also retained Susman Godfrey, L.L.P. to
16 represent me. It is my understanding that Susman Godfrey, L.L.P. is experienced in
17 litigating class actions, particularly anti-trust matters.

18 6. On July 26, 2018, I filed this lawsuit as a class action. By deciding to file
19 the lawsuit as a class action, I agreed to pursue not only my own claims, but also the
20 claims of all similarly situated individuals. In so doing, I agreed to put the interests of
21 the class ahead of my own. I also agreed to participate actively in the lawsuit and to
22 assume the risks of serving as a named Plaintiff and class representative.

23 7. Since hiring Susman Godfrey, L.L.P., Mayall Hurley, P.C., Ackermann &
24 Tilajef, P.C., and Melmed Law Group P.C. I have been in regular contact with my
25 attorneys and participated closely with them in all phases of this litigation. I have spent
26 considerable time helping the Class of individuals I seek to represent win compensation
27 from the Settling Defendants. The tasks I have been actively involved in included, but
28 are not limited to:

- 1 a. Interviewing and selecting Class Counsel;
- 2 b. Providing documents to Class Counsel relevant to the claims at issue;
- 3 c. Providing statements of factual details to Class Counsel to assist them in
- 4 understanding the nature of the Class' claims and to assist them in assessing potential
- 5 damages;
- 6 d. Assisting in the preparation of the class action and the subsequent
- 7 amendments;
- 8 e. Reviewing documents and policies produced by Defendants with Class
- 9 Counsel to assist them;
- 10 f. Reviewing discovery responses to ensure accuracy;
- 11 g. Traveling to, preparing for, and participating in a full day deposition in May
- 12 2021;
- 13 h. Preparing for and participating telephonically in the mediations on behalf of
- 14 the Class;
- 15 i. Participating in the settlement negotiations that culminated with the
- 16 Settlements; and
- 17 j. Following up with Class Counsel on a regular basis to check in regarding
- 18 the status of the case and whether anything further was needed of me.

19 8. Overall, I estimate that I have spent in excess of 200 hours of my time to
20 help vindicate the rights of the Class.

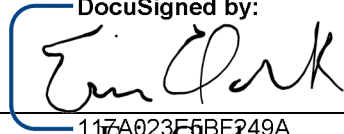
21 9. Although this case has been actively litigated for more than 5 years, I have
22 and remain willing to continue to pursue the claims against the Non-Settling
23 Defendants.

24 I declare under penalty of perjury under the laws of the United States and the State
25 of California that the foregoing is true and correct.

6/13/2022

Executed on _____ Irving in, Texas.

DocuSigned by:

/s/  _____
117A023E6BE249A...
Eric Clark

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28