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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 COUNTY OF ALAMEDA

13 ALEXANDER GUREVICH, et al., )	<b>CASE NOS.</b>	<b>RG12631895 (Lead Case)</b>
14 Plaintiff, )		<b>RG12639791</b>
15 v. )		<i>[Assigned to the Hon. Wynne Carvill, Dept. 21]</i>
16 ROYAL AMBULANCE, INC., et al., )	<b>CLASS ACTION</b>	
17 Defendants. )	<b>SUPPLEMENTAL DECLARATION OF</b>	
18 _____ )	<b>ROBERT S. JARET IN SUPPORT OF</b>	
19 KEVIN DICKENS, et al., )	<b>MOTION FOR FINAL APPROVAL OF</b>	
20 Plaintiffs, )	<b>Complaints filed: May 24, 2012</b>	
21 v. )	<b>July 18, 2012</b>	
22 ROYAL AMBULANCE, INC., et al., )	<b>Trial Date: Not set</b>	
23 Defendants. )	<b>Reference No. R-1648298</b>	
24 _____ )		

25 I, Robert S. Jaret, declare as follows:

- 26 1. I am licensed to practice law before all courts in the State of California, and am  
27 attorney of record for the KEVIN DICKENS Plaintiffs.
- 28 2. The purpose of this Supplemental Declaration is to request that the Court approve

1 the Service Payments to the Class Representatives in this action. This includes payments of \$10,000  
2 to each of the lead named Plaintiffs, KEVIN DICKENS and ALEXANDER GUREVICH, and  
3 \$3,000 each to PATRICK OPPIDO, SPENCER STECZ, CHRIS HERN, AND PHILIP JONES as  
4 fair and reasonable compensation.

5 3. In my 25 years of employment law experience, I have observed that it is a  
6 significant concern to many employees that if they file a lawsuit there will be a “public record” of  
7 the litigation. There is a stigma and fear that employers, and prospective employers will  
8 discriminate against them for filing a lawsuit against one of their employers. This has become even  
9 more apparent as public records are more accessible on the Internet.

10 4. In this case, Plaintiff KEVIN DICKENS brought what he believed to be unfair  
11 employment practices of his former employer to our attention. DICKENS was concerned not only  
12 for himself but his fellow employees. Although he was also concerned about the risk of adverse  
13 treatment for being a named plaintiff in this action, he believed that it was the right thing to do and  
14 that he needed to take this risk.

15 5. During the course of the litigation, KEVIN DICKENS was available and extremely  
16 helpful. He assisted us in locating numerous witnesses and in conducting our due diligence  
17 regarding the claims that have been pursued. DICKENS was in regular communication with our  
18 office by telephone and email regarding all aspects of litigation and settlement issues. DICKENS  
19 quickly answered any questions of the attorneys, reviewed drafts of all documents filed in this  
20 litigation, including the complaint, the settlement agreement, and the revised settlement agreement  
21 as well. DICKENS also personally attended both mediation sessions before Mark Rudy, on April  
22 29, 2013 and August 6, 2013. DICKENS and ALEXANDER GUREVICH were the only class  
23 representatives present at these mediations. DICKENS was also instrumental in transmitting  
24 information to the other class Representatives and his former colleagues, and responded to  
25 numerous telephone calls from class members regarding the status of the case. Based on my  
26 communications with DICKENS, he spent dozens of hours assisting counsel with this case.  
27 Although DICKENS’ initial involvement preceded the other class representatives, and his time  
28 commitment was much more significant than the other named Plaintiffs, PATRICK OPPIDO,

1 SPENCER STECZ, CHRIS HERN, and PHILIP JONES were also very helpful. Each agreed to  
2 accept the potential risk of being named Plaintiffs, each helped with our investigation and due  
3 diligence, and each reviewed the case materials including the Complaint, and proposed settlement  
4 agreement.

5 I declare under penalty of perjury under the laws of the State of California that the  
6 foregoing is true and correct, and if called upon, I could competently testify thereto.

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Executed this 14th day of July 2015 at San Rafael, California.

  
ROBERT S. JARET