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Attorneys for Plaintiffs, the Collective  
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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO**

DESIDERO SOTO, STEVEN STRICKLEN,  
STEEVE FONDROSE, LORENZO  
ORTEGA, and JOSE ANTONIO FARIAS,  
JR., on behalf of themselves and all other  
similarly situated,

Plaintiffs,

vs.

O.C. COMMUNICATIONS, INC.,  
COMCAST CORPORATION, and  
COMCAST CABLE COMMUNICATIONS  
MANAGEMENT, LLC,

Defendants

Case No.: 3:17-cv-00251-VC

**DECLARATION OF STEEVE FONDROSE  
IN SUPPORT OF MOTION FOR  
APPROVAL OF SERVICE AWARD AS  
CLASS REPRESENTATIVE**

Date: October 17, 2019

Time: 10:00 a.m.

Courtroom: 4 (17th Floor)

Judge: Honorable Vince Chhabria

Complaint Filed: January 18, 2017

**DECLARATION OF STEEVE FONDROSE**

I, Steeve Fondrose, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I make this declaration based on my personal knowledge.

2. I am a Named Plaintiff in the above-captioned action against Defendants O.C. Communications, Inc. ("OCC"), Comcast Corporation, and Comcast Cable Communications Management, LLC ("Comcast") (collectively, "Defendants").

3. I worked for Defendants as a Technician on installation services such as installing cable television, phone, security and internet service systems in commercial and residential settings.

4. Between approximately May 2014 and February 2015, I worked for Defendants as a Technician in Florida. In February 2015, I was promoted to a Supervisor position. I left OCC in September 2015 and returned to work as a Technician for OCC between approximately January 2016 and May 2016. I worked with OCC in the Miami, Fort Lauderdale, and Jacksonville, Florida branches.

5. As a Technician, my duties included, but were not limited to, driving to customers' residences, installing cable, telephone, and internet service, making repairs, troubleshooting, educating customers, and providing installations and troubleshooting integral to Comcast's service.

6. When I worked for Defendants, I worked overtime hours for Defendants without being paid overtime premiums. I was also required to work off-the-clock before my shifts to gather equipment and for inventory checks and I also worked off-the-clock after my shifts. The wage statements that I received did not accurately reflect my actual hours worked or actual wages earned.

7. I joined this lawsuit as a Named Plaintiff, because Defendants did not pay me for all hours worked or overtime compensation in weeks when I worked over forty (40) hours per week and failed to keep accurate records of all hours worked.

8. During this lawsuit, I have spent my own personal time working closely with my attorneys. I provided information regarding my work experience with Defendants, the allegations

DECLARATION OF STEEVE FONDROSE

*Desidero Soto, et al. v. O.C. Communications, Inc.*, Case No. 3:17-cv-0251-VC

1 in the lawsuit, as well as documents, including timesheets, daily reports and paystubs. My  
2 attorneys used this information to determine what claims to bring and to strategize the class  
3 action lawsuit.

4 9. I have spent significant personal time strategizing with my attorneys as the case  
5 moved forward. I regularly communicated with my attorneys via telephone to discuss the status  
6 of the case. These communications concerned but were not limited to: amending the Complaint  
7 to add additional plaintiffs, claims, and when Comcast was added as a defendant; the briefing on  
8 conditional certification of and facilitation of notice to the FLSA Collective of Defendants'  
9 Technicians; the briefing on Defendants' motions to compel arbitration, and when my attorneys  
10 filed over 600 individual arbitration demands. I also strategized with my attorneys during their  
11 review of documents produced by OCC.

12 10. Further, this case involved two separate mediations – I cleared my schedule and  
13 made myself available for both mediations and communicated with my attorneys throughout the  
14 settlement process.

15 11. The parties eventually reached an agreement to settle the case. I reviewed and  
16 approved the proposed settlement agreement.

17 12. In sum, I have been significantly involved with this litigation for over two years,  
18 and during that time I have contributed a substantial amount of my own time to the prosecution  
19 of these claims.

20 13. I have worked as a Technician in the cable industry for approximately five years.

21 14. Despite the potential risk of retaliation in the cable industry, I stepped forward to  
22 represent the interests of my fellow class members, including risking my reputation in the  
23 community in which I make my livelihood.

24 15. As noted above, I have devoted substantial time and energy to this case, at great  
25 personal risk and expense.

26 16. As part of the settlement agreement, I have agreed to release any and all  
27 claims I have against Defendants.

28 17. Based upon my participation in this case, and also based upon my knowledge of  
the facts and the law, as explained to me by my attorneys, I believe that the settlement is fair and

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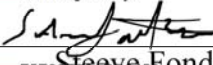
DECLARATION OF STEEVE FONDROSE

*Desidero Soto, et al. v. O.C. Communications, Inc.*, Case No. 3:17-cv-0251-VC

1 reasonable, and that my hard work has led to a beneficial result for the Class and Collective.

2 18. I therefore respectfully request that the Court grant final approval of the service  
3 payment agreed to by the parties of \$10,000.00 in the settlement agreement.

4 Dated: September 8, 2019

DocuSigned by:  
  
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Steeve Fondrose

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