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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

KRIS HARDIE, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

BEST PARKING LOT CLEANING INC., a  
Washington Corporation,

Defendants.

NO. 17-2-27730-4 KNT

**DECLARATION OF RON COLLINS**

I, **RON COLLINS**, declare and say as follows:

1. I make the following declaration based on my own personal knowledge. I am over the age of 18 and am competent to testify on the matters presented in this declaration.

2. I worked for Best Parking Lot Cleaning INC. (“Best”) as a mechanic from approximately June 2015 to April 2016.

3. While working for Best, I was a resident of Washington State. I currently live in Puyallup, WA.

4. While working for Best, I had many conversations with the drivers that worked there.

5. One of the things that I frequently heard from the drivers was that Best was not paying them properly.

1           6.       There were many complaints and issues regarding prevailing wage jobs. I  
2 remember talking to one driver who was frustrated with the pay-averaging system that Best  
3 uses to pay its employees. He was making less money than he should have been making  
4 because of it.

5           7.       I often heard drivers complain about not being able to take meal breaks, but  
6 meal breaks were still deducted from their pay. It was the nature of the job to not be able to  
7 take breaks, and the drivers would report not taking a meal break. I heard management and  
8 Rebecca insist upon the meal break deductions as being a part of the company's policy and that  
9 it was in accordance with state law, regardless of whether the meal break was taken or not.

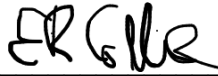
10          8.       It was my impression as well as the driver's impression that if I or they worked  
11 through a meal break we would be compensated for that time accordingly. This was often not  
12 the case.

13          9.       Every day, I saw truck driving employee perform a pre-trip and post-trip  
14 inspection to ensure the truck was safe and operable and to prepare for the job. Regardless of  
15 how long it took, they could only report that the inspection took no longer than 15 minutes  
16 each. It typically took 30 minutes to perform a proper pre-trip inspection and even longer for  
17 the post trip inspection since they had to clean out the truck as well. I can attest to this and  
18 instances taking longer than the given time because as a mechanic I knew that those trucks  
19 were breaking down all the time. Much of the equipment was faulty and therefore would  
20 require additional time to perform the pre/post trips.

21          10.       As an employee of Best, I believe I was only paid for the first 15 minutes of  
22 each pre and post trip inspection. Best failed to pay me for the rest of the time that it took to  
23 complete the pre or post trip inspection.

1 I declare under penalty of perjury under the laws of the State of Washington that the  
2 foregoing is true and correct.

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4 EXECUTED at Walla walla, Washington this 2 day of September, 2018.  
5 [city] [month]

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