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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 GARY
WIEBURG**

I, **Garry Wieburg**, 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 driver for approximately one month in 2015. I primarily worked for Best in King County and Pierce County, including the City of Seattle.

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

4. During my employment with Best, I was paid on an hourly basis. From what I know, I worked only non-prevailing wage jobs. As a trucking employee, I was never informed of whether a job was a prevailing wage job or not.

1 5. Best did not provide me with 10 minute rest breaks. I understand that under
2 Washington law, I am entitled to an uninterrupted 10 minute rest break for every four hours of
3 work where I am relieved of all my work related duties. Throughout my time working at Best,
4 for every four hours that I worked I almost never took any rest breaks.


5 6. Best made no effort to arrange my schedule to ensure that I received a paid rest
6 break of at least ten minutes for every four hours that I worked. Best failed to instruct me to
7 take proper rest breaks at all during my employment. Moreover, I am unsure whether Best paid
8 me extra compensation for my missed rest breaks. There was no policy or procedure in place
9 for me to inform Best of missed rest breaks.

10 7. Best also did not provide me with proper meal breaks. I was frequently required
11 to end meal breaks early due to the nature of my work or often I was unable to take one at all.
12 There was no policy or procedure in place for me to inform Best of missed meal breaks.

13 8. It was my impression that if I worked through my meal break, I would be paid
14 for that time. I believe Best deducted 30 minutes of pay, regardless of whether I worked
15 through those breaks or not. Best did not instruct me to take proper meal breaks at all during
16 my employment.

17
18 I declare under penalty of perjury under the laws of the State of Washington that the
19 foregoing is true and correct.
20

21 EXECUTED at Auburn, Washington this 9 day of September, 2018.
22 [city] [month]

23 
24 _____
25 Gary Wieburg
26