

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

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

Plaintiff,

v.

BEST PARKING LOT CLEANING INC., a
Washington Corporation,

Defendant.

No. 17-2-27730-4 KNT

SUPPLEMENTAL DECLARATION
OF KRIS HARDIE IN SUPPORT OF
PLAINTIFFS' MOTION FOR
CLASS CERTIFICATION

I, KRIS HARDIE, 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 am the named Plaintiff in this action.
3. I am acquainted with Royce Gentry through work. I do not recall ever seeing Mr. Gentry while on standby at the Shell Station. I do not recall ever seeing him at any of the dump sites. I do not believe he and I ever talked about work.

4. I have known Ryan McGlamery for approximately eight years. I do not believe that he and I ever stopped to eat lunch or take a break together at a Shell station while on the job.

I never read the paper while at work, as he describes in his declaration.

5. I am acquainted with Jay Fox through work. I did not become drunk with any sales clients at the Melrose Grill. I have never brought a case of beer to work or to a jobsite. I have never told anybody that “it was OK to drink beer because it was a Saturday job,” or words to that effect.

6. I am acquainted with Josh Riddle through work. I do not have “Nazi propaganda,” nor am I sympathetic to Nazism. I have never come to work with a busted jaw from a bar fight. I have never taken a case of beer to a work truck.

7. I am acquainted with Thomas Varelmann through work. I have never taken him to a bar while he was underage. He has never had to drive me home because I was drunk. I do not believe he has ever been to my home. I have never made a poster accusing anyone of being a child molester. I am not a hard drinker or a fighter. I have never come to work with a busted jaw from a bar fight. I have never set a truck on fire, nor said that I have. I have never called the wife of the owner of Bulldog Plumbing a “C” word.

8. I am acquainted with Jeff Stroud through work. I have never had an empty bottle of booze fall out of my truck cab.

9. I am acquainted with Morgan Bell through work. I have never threatened to kill him. I am not mentally unstable, nor am I a violent alcoholic.

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

EXECUTED at Bellevue, Washington this 10th day of December, 2018.
[city]



Kris Hardie