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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.

BPLC PARKING LOT CLEANING INC., a
Washington Corporation,

Defendants.

NO. 17-2-27730-4 KNT

DECLARATION OF DONALD WREN

I, **DONALD WREN**, declare and 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 BPLC Parking Lot Cleaning INC. (“BPLC”) as a full time driver starting around August 2017. I worked for BPLC in King County, including the City of Mercer Island, and Pierce County.

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

4. During my employment with BPLC, I was paid on an hourly basis. I worked on private-sector jobs, primarily. I believe I also worked an occasional public works job, including the I-405 widening project.

1 5. While working at BPLC, I operated a Closed-circuit television (CCTV) truck for
2 inspecting sewers and pipes during construction projects.

3 6. I worked long hours. On one occasion I worked around 20 hours in one day.
4 There was one occasion where I worked a long day, clocked out at 2:00 a.m., and had to report
5 to work the next morning at 5:00 a.m.

6 7. BPLC did not provide me with proper 10-minute rest breaks. I understand that,
7 under Washington law, I am entitled to an uninterrupted 10-minute rest break for every four
8 hours of work where I am relieved of all my work-related duties. Throughout my time working
9 at BPLC, for every four hours that I worked I almost never took any rest breaks.

10 8. BPLC made no effort to arrange my schedule to ensure that I received a paid
11 rest break of at least ten minutes for every four hours that I worked. BPLC failed to instruct me
12 to take proper rest breaks at all during my employment. Moreover, I am unsure whether BPLC
13 paid me extra compensation for my missed rest breaks. There is no policy or procedure in place
14 for me to inform BPLC of missed rest breaks.

15 9. BPLC also did not provide me with proper meal breaks. I was frequently
16 required to work through meal breaks or end meal breaks early due to the nature of my work.
17 Even when I worked through a meal break or missed one altogether, BPLC would instruct me
18 to falsely write on my driver sheet that I had taken a meal break. In this way, the company
19 deducted half an hour from my daily hours even when I had not received a proper meal break.

20 10. While working at BPLC, the company often did not pay me properly. On at least
21 one occasion that I am aware of, there was money missing from my paycheck. I remember
22 identifying 20-30 hours of work for which I was not paid.

23 11. I did work at BPLC for very long because the company did not treat me well. I
24 took up the issue I had with meal breaks and underpayment to Rich Hamilton. He told me he
25 would give me \$200.00 in my next paycheck to make up for the underpayment. This is less
26

1 than what I was owed. Rich Hamilton eventually gave me \$200.00 in cash “under the table.” I
2 quit the job because of this sort of unlawful underpayment of wages.

3 12. I received multiple phone calls from people at BPLC during the week of March
4 11-15, 2019. I answered one of these phone calls and spoke with a woman who I believe to be
5 Rebecca Craig. She told me that she wanted me to sign a form for her. I asked her what the
6 form was for. She said the form was to exclude myself from “the lawsuit.” I told her that I did
7 not want to sign the form. I told her that I think if the company did something wrong, then they
8 need to be accountable for that. I did not answer the other phone calls from BPLC.

9
10 I declare under penalty of perjury under the laws of the State of Washington that the
11 foregoing is true and correct.

12
13 EXECUTED at Auburn, Washington this 03/18/2019 day of March, 2019.
14 [city] [month]

15 

16 _____
DONALD WREN

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FILE NAME	2019.03.18 Donald Wren Decl.pdf
DOCUMENT ID	bb7e405d77f2b3463708ce7ae00e157f2eef3be3
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