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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

CANAN SCHUMANN, individually and
on behalf of all similarly situated,

Plaintiff,

v.

AMAZON.COM SERVICES LLC;
AMAZON.COM, INC., a foreign
corporation,

Defendant.

Case No. 20-cv-01751-JR

**DECLARATION OF
STEPHANIE J. BROWN
SUPPORTING STIPULATION
OF SETTLEMENT
AGREEMENT OF CLASS
ACTION CLAIMS**

I, Stephanie J. Brown, hereby declare:

1. I am one of the attorneys for Plaintiff herein. I make this declaration upon personal knowledge and in support of the Stipulation of Settlement of Class Action Claims and amounts requested to be awarded therein.

2. I am an attorney in and co-founder of the law firm Schuck Law, LLC. Before starting Schuck Law, LLC, I was an associate attorney at Bailey, Pinney & Associates, LLC.

3. I graduated from New Hampshire School of Law in 2001.

4. I was admitted to practice law in the State of New Hampshire in 2002, then admitted to the State of Oregon in 2003, the State of Washington in 2009, and the United States District of Oregon. I am no longer admitted to practice in New Hampshire.

5. I have limited my practice (with minor exceptions) to employment litigation emphasizing wage and hour law.

6. Before starting Schuck Law, I worked exclusively on wage and hour cases, primary class actions. Since starting Schuck law, I have been involved in the prosecution of approximately over 400 individual wage and hour cases. I also share duties with regard to the class action cases we prosecute at Schuck Law, LLC. While my case load varies, I generally am in charge of 20-30 individual cases and share responsibility for our class action cases at any one time. My practice has always focused on Oregon state and federal wage-and-hour individual cases, along with complex class and collective actions. I have extensive experience in this area of law. The attorneys at Schuck Law have represented and prevailed or settled claims for over 110,000 individuals in class and/or collective actions, all of whom were entitled to recover wages, damages, civil penalties, or penalty wages from their current or former employers. The attorneys at Schuck Law have recovered over \$33 Million for our wage and hour class clients through verdicts or settlements.

7. Due to my experience in wage and hour law, I am regularly contacted with questions by Oregon attorneys regarding litigation of wage and hour cases under Oregon law and the Fair Labor Standards Act and am regularly referred wage and hour cases by my colleagues. I have also been invited to speak on wage and hour issues.

8. I have worked on dozens of complex wage and hour cases. Notably, I significantly participated in the prosecution and appeal in *Mathis v. St. Helens Auto Center, Inc.*, 367 Or 437 (2020); *Maza et al v. Waterford Operations, LLC and Coos Bay Rehabilitation, LLC*, 300 Or App 471 (2019); *Trent v. Connor Enterprises, Inc., dba Best Western New Oregon*, 300 Or App 165 (2019) (ORS 652.200 attorney fees are mandatory), and 325 Or App 252 (2023) (nonprecedential) (trial court decision on attorney fees must have sufficient evidentiary support); *Brunozzi and McCormick v. Cable Communications, Inc.*, 851 F.3d. 990 (9th Cir.), *cert. denied* 583 U.S. ___, 138 S.Ct. 167 (2017) (employer may not subtract overtime from a bonus to defeat payment of wages and further that internal reporting of wage complaints to management are sufficient to allow the employee protection under ORS 659A.199 and ORS 653.055); and *Krohn v. Hood River School District*, 250 Or App 8 (2012) (union contract did not divest the circuit court's jurisdiction to hear Plaintiff's minimum wage claim and wrongful deduction claims.)

9. I have been a delegate to the Oregon State Bar House of Delegates since April 2018.

10. The attorneys at Schuck Law have advanced the rights of employees through the prosecution and appeal.

11. **Class Counsel Experience:**

In each class action case listed below, the case was certified as a class action and the attorneys at Schuck Law either performed the primary litigation duties or assisted other attorneys in their prosecution.

Oregon State Courts: *Patrick v. McMenamins, Inc.*, Multnomah County Circuit Court, case no. 20CV25538 (pending); *Hensley et al v. Ulta Salon, Cosmetics & Fragrance, Inc.*,

Multnomah County Circuit Court, case no. 18CV 00622 (pending); *Grable v. Safeway*, Multnomah County Circuit Court, case no. 15CV09585; *Reddick v. Global Contact Solutions, LLC.*, Multnomah County Circuit Court, case no. 15CV02075; *Maza et al v. Waterford Operations, LLC and Coos Bay Rehab., LLC*, Jackson County Circuit Court, case no. 14CV03147 (pending); *Seaunier v. Northwest Inventory Services, Inc.*, Multnomah County Circuit Court case no. 1311-15319; *Bey v. Solarworld et al.*, Multnomah County Circuit Court, case no. 1212-16562; *Holden v. Staples, Inc.*, Multnomah County Circuit Court, case no. 0703-02492; *Bocage v. The Stoller Group, dba Express Personnel*, Multnomah County Circuit Court, case no. 0701-00159; *Migis v. AutoZone*, Multnomah County Circuit Court, case no. 0711-13531 (assisted); *Ballard v. Reser's Fine Foods, Inc.*, Multnomah County Circuit Court, case no. 0712-14236; *Brune v. Freightliner LLC*, Multnomah County Circuit Court, case no. 0602-02237; *Light v. Aramark, et al.*, Multnomah County Circuit Court, case no. 0601-00728; *Shanks v. Circuit City Stores, Inc.*, Multnomah County Circuit Court, case no. 0601-00006; *Lussier v. Home Depot USA, Inc.*, Multnomah County Circuit Court, case no. 0502-01825 (assisted); *Greene v. Salomon Smith Barney, Inc.*, Multnomah County Circuit Court, case no. 0502-01824 (assisted); *Lussier v. Dollar Tree Stores, Inc.*, Multnomah County Circuit Court, case no. 0502-01624; *Kuhn v. Wells Fargo Bank Northwest*, Multnomah County Circuit Court, case no. 0411-11525; *Folska v. Gunderson, Inc.*, Multnomah County Circuit Court, case no. 0409-09821; *Gladfelder v. Sears*, Multnomah County Circuit Court, case no. 0408-08158; *Arthur v. Adecco*, Multnomah County Circuit Court, case no. 0405-04602; *Dunlap v. Big Lots*, Multnomah County Circuit Court, case no. 0403-03121 (assisted); *Lakefish v. International Sports Management*, Multnomah County Circuit Court, case no. 0312-12878 (also resolved a California class action inside this case);

Andersen v. Xerox Multnomah County Circuit Court, case no. 0212-13042; *Peters v. Addus Health Care*, Multnomah County Circuit Court, case no. 0212-12203; *Nelson v. Children's World* Multnomah County Circuit Court, Case no. 0211-11489; *Miller v. Villa Pizza*, Multnomah County Circuit Court, case no. 0203-02810; *Thai v. Mt. Hood Ski Bowl* Multnomah County Circuit Court, case no. 0122-12739; *Boggs v. LaPetite Academy* Multnomah County Circuit Court, case no. 0112-12617; *Nieves v. Orrius*, Coos County Circuit Court, case no. 01CV0397 (assisted); and *McGrothy v. Triquent*, Multnomah County Circuit Court, case no. 0004-03817.

Oregon Federal Courts: *Makaneole v. SolarWorld et al*, U.S. District Court of Oregon, case no. 14-CV-1528-JR; *Ridderbush v. Swift Transportation, et al*, U.S. District Court of Oregon, case no. 11-CV-1028-HZ; and *Moore/Klink v. Wal-Mart*, U.S. District Court of Oregon, case nos. 08-CV-48-MO & 09-3018-MO.

California Federal Court: *In re Wal-Mart Stores, Inc. Wage and Hour Litigation*, case no. C 06-2069 SBA, 2008 U.S. Dist. LEXIS 14756 (N.D. Cal. Feb. 13, 2008) (attorneys Brown, Schuck, and Moore prosecuted the Oregon counterpart case and worked with California counsel regarding claims to allege to obtain class certification and mediation efforts.)

12. The Settlement reached in this case is fair, adequate and reasonable as to all potential Class Members. While the parties did not exchange formal discovery, the underlying issues in this case are based on the same employer practices and documents as relied on *Swearingen v. Amazon.com*, case no. 19-cv-01156-JR (granting final approval of similar settlement). The parties in this case underwent a day-long mediation with respected Seattle mediator Teresa Wakeen on November 18, 2022. While that mediation did not immediately

result in a settlement, the parties continued to exchange information and offers in an effort to reach the settlement that the parties jointly seek preliminary approval. This settlement has been reached only after significant arm's length negotiations over the specific terms.

13. Schuck Law, LLC was retained by Plaintiff on a contingency basis with Schuck Law permitted to seek one-third of the total settlement.

14. Cases are accepted by this firm based upon the belief that a defendant has violated some statutory employment protection law, not based upon the size of the underlying claim. I consider my representation in such cases to be a matter of social and public benefit in redressing violations of statutory employment laws.

15. The fact that Plaintiff's claims are small makes an award of a full measure of damages all the more imperative. Statutory purposes can only be effected by an award of the full amount of attorneys' fees to encourage an attorney to prosecute the small yet difficult claims, and to discourage employers from litigating cases where clear liability exists.

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

Executed on April 21, 2023.

Schuck Law, LLC

/s/ Stephanie J. Brown
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Attorney for Plaintiff