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Attorney for Plaintiff and Class

**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 KAREN A.  
MOORE SUPPORTING  
STIPULATION OF  
SETTLEMENT AGREEMENT  
OF CLASS ACTION CLAIMS**

I, Karen A. Moore, 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 at Schuck Law, LLC. I have worked primarily on wage and hour cases, including class actions. While my case load varies, I generally am in charge of 20-30

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individual cases and share responsibility for our class action cases at any one time.

3. I graduated from Lewis and Clark Law School in December 2003.

4. I was admitted to practice law in the State of Oregon in April 2004, the State of Washington in May 2010, the United States District of Oregon in January 2006, and Ninth Circuit Court of Appeals in March 2011.

5. My practice focuses 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.

6. As part of the Oregon State Bar Labor and Employment Section Annual CLE Boot Camp Each, I have jointly presented “Nuts and Bolts of Wage and Hour laws” in each year from 2015 through 2019, and 2021. I am set to again jointly present this CLE in June 2023.

7. In January 2018, I presented “Wage and Hour Basics” covering Oregon, Washington, and federal laws at the Oregon Labor Law Conference.

8. Due to my experience in wage and hour law, I am contacted by Oregon attorneys regarding litigation of wage and hour cases under Oregon law and the Fair Labor Standards Act.

9. I have been a delegate to the Oregon State Bar House of Delegates since April 2016.

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

prosecution and appeal on the following: *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), *rev den* 366 Or 455 (2020) (ruling on the requirements for meal periods and their affection on wages); *Jones v. Four Corners Rod & Gun Club*, 366 Or 100 (2020) (reversing Court of Appeals on whether minimum wage claim was prevailed upon and amount of damages on counterclaims) and 290 Or App 811 (2018) (holding that attorney fees were recoverable and affirming counterclaims and loss on minimum wage claim. The attorney fee ruling was not taken by the Supreme Court and the affirmation on the minimum wage claim was reversed and modified); *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.)

11. **Class Counsel Experience:** The attorneys at Schuck Law represented and prevailed or settled claims for over 107,000 individuals, all of whom were entitled to recover wages, damages, civil penalties, or penalty wages from their current or former employers.

**Oregon:** 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

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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

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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; *Neaves 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. Oregon Courts have approved and appointed attorneys at Schuck Law to handle the day-to-day administration of the following class action settlements: *Grable v. Safeway*, Multnomah County Circuit Court, case no. 15CV09585; *Reddick v. Global Contact Solutions*,

*LLC*, Multnomah County Circuit Court, case no. 15CV02075; *Seaunier v. Northwest Inventory Services, Inc.*, Multnomah County Circuit Court case no. 1311-15319; *Bocage v. The Stoller Group, dba Express Personnel*, Multnomah County Circuit Court, case no. 0701-00159; *Arthur v. Adecco*, Multnomah County Circuit Court, case no. 0405-04602; *Lakefish v. International Sports Mgt*, Multnomah County Circuit Court case no. 0312-12878; and *Thai v. Mt. Hood Ski Bowl*, Multnomah County Circuit Court case no. 0122-12739.

13. Courts have also approved Schuck Law, LLC as administrator for sending class notice under ORCP 32F(1) or FRCP 23(c)(2) in the following cases: *Peck v. First Student, Inc. et al*, Multnomah County Circuit Court, case no. 17CV16084; *Hurst v. First Student, Inc.*, US District Court of Oregon, case no. 15-CV-00021-HZ and *Maza et al v. Waterford Operations, LLC and Coos Bay Rehab., LLC*, Jackson County Circuit Court, case no. 14CV03147.

14. Prior to joining Schuck Law, I also handled all responsibility of settlement administration of the following class actions: *Tanguay v. Columbia Distributing, Co. et al*, Multnomah County Circuit Court, case no. 1106-07531; *Moore-Thomas v. Alaska Airlines*, Multnomah County Circuit Court, case no. 0603-03134; *McPherson v. BHGAH Airport, LLC*, Multnomah County Circuit Court, case no. 0609-10238; and *Greene v. Salomon Smith Barney, Inc.*, Multnomah County Circuit Court, case no. 0502-01824.

15. 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 mediator

Teresa Wakeen. 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.

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

17. 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/ Karen A. Moore  
KAREN A. MOORE, Esquire  
OSB # 040922, WSB # 42476  
(360) 566-9243  
Attorney for Plaintiff