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14 **UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

15 DUANE WATERS, DEBRA TURNER)
16 and RUDY FAJARDO, on behalf of)
17 themselves, all others similarly situated)
and the general public,)
18 Plaintiffs,)
19 vs.)
20 AT&T SERVICES, INC. (formerly SBC)
Services, Inc.) and DOES 1 through 10;)
21 Defendants.)

Case No: CV 09-3983 BZ

**DECLARATION OF DEBBI TURNER IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND MOTION FOR
AWARD OF ATTORNEYS' FEES, COSTS,
CLAIMS ADMINISTRATION EXPENSES
AND CLASS REPRESENTATIVE
ENHANCEMENTS**

**Date: February 9, 2011
Time: 10:00 a.m.
Courtroom: G**

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1 I, Debbi Turner, declare as follows:

2 1. I am one of the Class Representatives in the above captioned action. I
3 have personal knowledge of the facts set forth herein, (except where indicated
4 upon information and belief) and if called as a witness, could and would testify
5 competently thereto. I am making this Declaration in support of Plaintiffs'
6 Motion for Final Approval and Motion for Award of Attorney Fees and Costs,
7 Claims Administration Expenses and Class Representative Enhancement.

8 2. Without revealing any confidential information, I can state, without any
9 hesitancy, that from the time of the filing of this lawsuit, and continuing after its
10 settlement, I regularly expended effort on behalf of the class and this litigation.

11 3. In order to determine how much time I spent working on behalf of my
12 employers during the years previous to the filing of the lawsuit, it was necessary
13 for me to go back and review many documents and emails, and to find such
14 documents in an attempt to make such a compilation.

15 4. As I was claimed to be exempt by my employer, prior to the
16 commencement of this case, I did not keep track of my time. Thus it was also
17 necessary for me to review whatever documentation I had available, or was
18 provided to me, e.g., emails, organizational charts, or correspondence, to
19 determine how much time I had, in fact, worked during that period.

20 5. Further, our attorneys, and specifically Mr. Falvey and his staff, were
21 constantly updating us with information, and seeking our take on what they were
22 being informed of, and or learning, as the case progressed. I know that I
23 personally spent an average of between 15-25 hours a month on the case,
24 and additionally most likely either generated or received an average of 15-20
25 telephone calls and/or emails a month, all relating to the case up through the
26 current time.

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28 Declaration of Debbi Turner in support of Plaintiffs' Motion for Final Approval of Class Action
and Motion for Award of Attorney Fees and Costs, etc.

1 6. At the beginning of the case, I spoke with Attorney Thomas Falvey to
2 discuss the factors going on in the case.

3 7. As I was one of the lead plaintiffs, after the case was filed, people
4 contacted me frequently, asking about the status of the case.

5 8. Ever since the case was filed, I have been asked about its status, its
6 progress, and various details which might or might not effect each of my former
7 fellow employees, probably working 15 or more hours per month, and in some
8 months working 20-25 hours per month. In the past 2 months alone I have spent
9 over 80 hours going through all my former contact sheets, emails, cell phone
10 contacts, etc.

11 9. In order to assist the class members, I also undertook to locate them,
12 because many had moved to other locations, often because of having been
13 terminated from AT&T. I used my former contact sheets to get in touch with the
14 members I had been directly associated with. I then tried to find other possible
15 members by contacting other class members, as well as former employees of
16 AT&T who were not in the class. I personally searched lists of class members
17 through other means, using Google, LinkedIn, Facebook and/or Yahoo white
18 pages.

19 10. I am aware that if a person googles my name, they might discover my
20 involvement in the lawsuit and that fact might have an impact on any future job
21 search. In fact, I was concerned that while I had been eligible for rehire, I might
22 no longer be eligible.

23 11. I attended several gatherings of both former and current employees where
24 the case was discussed.

25 12. One of the experiences involved attempting to locate a fellow employee
26 through linkedin, which required me to make contacts to keep updated on the

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28 Declaration of Debbi Turner in support of Plaintiffs' Motion for Final Approval of Class Action
and Motion for Award of Attorney Fees and Costs, etc.

1 person.

2 13. I was criticized and questioned about my involvement in the case. A number
3 of current employees expressed worry about losing their jobs if they sent in the
4 survey questionnaire. They were even more concerned about submitting the claim
5 form.

6 14. Nevertheless I proceeded with the case, as I felt it was in the best interests of
7 the class members to do so.

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

10 Executed on December 21, 2010, in San Diego,
11 California.

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13 Debra Turner
14 Signature

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Declaration of Debbi Turner in support of Plaintiffs' Motion for Final Approval of Class Action
and Motion for Award of Attorney Fees and Costs, etc.