

BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

In the matter of the Appeal of:) Hearing Examiner File:
) **No.: LS-21-002**
BAJA CONCRETE USA CORP., ROBERTO) **LS-21-003**
CONTRERAS, NEWWAY FORMING INC.,) **LS-21-004**
and ANTONIO MACHADO)
) DECLARATION OF CINDI WILLIAMS IN
from a Final Order of the Decision issued by) SUPPORT OF RESPONDENT CITY OF
the Director, Seattle Office of Labor Standards) SEATTLE'S MOTION FOR SUMMARY
) JUDGMENT

I, Cindi Williams, hereby declare under penalty of perjury under the laws of the State of Washington that the following is true and correct to the best of my knowledge:

1. I am the Assistant City Attorney appearing for Respondents, the City of Seattle, the Seattle Office of Labor Standards, in the above-captioned matter. I am over the age of 18 and make this declaration based on personal knowledge. I am competent to testify as to the matters stated below.
2. The attached documents are true and correct copies of the following:
 - a. Relevant excerpts from the transcript of the Deposition of Kwynne Forler-Grant, on behalf of Newway Forming pursuant to CR 30(b)(6), taken on Thursday, May 5, 2022. This document is attached as **Exhibit A.**
 - b. Relevant excerpts from the transcript of the Deposition of Antonio Machado, taken on Tuesday, February 1, 2022. This document is attached as **Exhibit B.**
 - c. Relevant excerpts from the transcript of the Deposition of Mercedes de Armas, on behalf of Baja Concrete USA pursuant to CR 30(b)(6), taken on Tuesday, April 26, 2022. This document is attached as **Exhibit C.**

- 1 d. Relevant excerpts from the transcript of the Deposition of Daron Williams,
2 individually, taken on Thursday, February 3, 2022. This document is attached as
3 **Exhibit D**.
- 4 e. Relevant excerpts from the transcript of the Deposition of Katie Jo Keppinger, on
5 behalf of the Seattle Office of Labor Standards pursuant to CR 30(b)(6), taken on
6 Thursday, April 28, 2022. This document is attached as **Exhibit E**.
- 7 f. Relevant excerpts from the transcript of the Deposition of Daron Williams, on behalf
8 of the Seattle Office of Labor Standards pursuant to CR 30(b)(6), taken on Thursday,
9 April 28, 2022. This document is attached as **Exhibit F**.
- 10 g. Relevant excerpts from the transcript of the Deposition of Mercedes de Armas,
11 individually, taken on Wednesday, May 11, 2022. This document is attached as
12 **Exhibit G**.

13 Signed this 28th day of June, 2022, in Seattle, Washington.

14 /s/ Cindi Williams
15 CINDI WILLIAMS