

BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

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

I, Sara Kincaid, declare as follows:

1. I am an attorney for Appellant Machado in this civil action. I am over 18 years of age, am competent to make this declaration, and submit this declaration based upon my personal knowledge.

2. Attached as **Exhibit 1** is a true and correct copy of excerpts of the May 5, 2022, 30(b)(6) deposition transcript of Newway Forming, Inc.

3. Attached as **Exhibit 2** is a true and correct copy of excerpts of the February 1, 2022, deposition transcript of Antonio Machado.

4. Attached as **Exhibit 3** is a true and correct copy of excerpts of the February 3, 2022, deposition transcript of Daron Williams.

5. Attached as **Exhibit 4** is a true and correct copy of excerpts of the paystubs issued by Baja Concrete USA Corp. to the workers at issue.

6. Attached as **Exhibit 5** is a true and correct copy of Exhibit 6 to the May 5, 2022, 30(b)(6) deposition of Newway Forming, Inc.

7. Attached as **Exhibit 6** is a true and correct copy of Exhibits 7 through 15 to the February 3, 2022, deposition transcript of Daron Williams.

8. Attached as **Exhibit 7** is a true and correct copy of excerpts of the April 28, 2022, 30(b)(6) Deposition of City of Seattle via Daron Williams.

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

DATED this 1st day of July 2022 in Seattle, Washington.



Sara Kincaid, WSBA No. 55846
Attorney for Appellant Antonio Machado

DECLARATION OF SERVICE

I caused a copy of the foregoing Declaration of Sara Kincaid in Support of Appellant Machado's Motion for Summary Judgment to be served to the following in the manner indicated:

Via Email to:

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On today's date.

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct to the best of my belief.

Signed and DATED this 1st day of July 2022 in Seattle, Washington.

s/ Katie Christiansen
Katie Christiansen, Legal Assistant