

THE HONORABLE BRIAN MCDONALD  
CLERK OF COURT  
SUPERIOR COURT FOR THE STATE OF WASHINGTON  
FOR KING COUNTY

SUPERIOR COURT FOR THE STATE OF WASHINGTON  
FOR KING COUNTY

MIKE AALAND, individually and on behalf of  
those similarly situated,

Plaintiff,

v.

CONTRACTORS.COM LLC, a California Limited  
Liability Company, and ONE PLANET OPS INC.,  
a Delaware Corporation,

Defendant.

NO. 19-2-24212-4 SEA

**DECLARATION OF RACHEL M.  
EMENS IN SUPPORT OF MOTION  
FOR PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT**

I, Rachel M. Emens, declare as follows:

1. I am an attorney licensed to practice law in the State of Washington and a senior associate in the law firm of HKM Employment Attorneys LLP. I serve as Class Counsel for Named Plaintiff Mike Aaland, and the putative class in the above-captioned matter. If called to testify as to the matters set forth herein, I could and would do so competently.

2. On July 2, 2021, Plaintiffs filed the Unopposed Motion for Preliminary Approval of Class Action Settlement. At the time of filing, and as explained in the Motion, Exhibits 3 and 5 were not yet finalized and the parties intended to file them on or before the noting date of July 16, 2021.

3. Attached hereto at **Exhibit A** is a true and correct copy of Exhibit 3 of the Parties' Settlement Agreement, which is the Email Notice that has been prepared by the parties' settlement administrator for the Court's review.

4. Attached hereto at **Exhibit B** is a true and correct copy of Exhibit 5 to the Parties' Settlement Agreement. This document is a list of class members' telephone numbers provided to

1 our office today by defense counsel. Out of privacy concerns for the class members, the parties  
2 have agreed that the telephone numbers should be partially-redacted for purposes of this filing.

3  
4 I declare under penalty of perjury that the foregoing is true and correct.

5  
6 DATED this 16<sup>th</sup> day of July, 2021.

7 */s/ Rachel M. Emens*

8 Rachel M. Emens, WSBA No. 49047

9 **HKM EMPLOYMENT ATTORNEYS LLP**

10 *Attorney for Plaintiff Michael Aaland*

1 **CERTIFICATE OF SERVICE**

2 I, Taylor Saastad, certify under penalty of perjury under the laws of the State of  
3 Washington that I have caused service of a true and correct copy of the foregoing document, to  
4 be effected on the following named counsel in the manner identified below:

5 Paul Karlsgodt, WSBA No. 40311  
6 James R. Morrison, WSBA No. 43043  
7 **Baker & Hostetler LLP** [ ] Via Email  
8 999 Third Avenue, Suite 3600 [ ] Via Messenger  
9 Seattle, WA 98104 [ ] Via U.S. Mail, First Class  
10 Phone: 206-332-1380 [X] Via King County E-Service  
11 Fax: 206-624-7317  
12 E-Mail: pkarlsgodt@bakerlaw.com  
13 jmorrison@bakerlaw.com  
14 rmann@bakerlaw.com  
15 jhickman@bakerlaw.com

16 *Attorneys for Defendant Contractors.com LLC*

17 DATED this 16<sup>th</sup> day of July, 2021, at Seattle, Washington.

18 /s/ Taylor Saastad  
19 Taylor Saastad, Paralegal  
20 **HKM EMPLOYMENT ATTORNEYS LLP**

# Exhibit A

**From:** [EMAIL ADDRESS]  
**To:**  
**Subject:** Legal Notice of [SETTLEMENT NAME]

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Dear Recipient,

**You may be eligible for a payment from a class action settlement if you received a text message from Contractors.com or One Planet Ops**

Si desea recibir esta notificación en español, llámenos o visite nuestra página web [WEBSITE URL].

CLAIMANT ID: [XXXXXXXXXX]

YOUR INDIVIDUAL LEAD ID IS: xxxxxxxxxxxx. RETAIN THIS NUMBER TO REDEEM YOUR LEADS.

A settlement has been reached in a class action lawsuit against One Planet Ops Inc. and Contractors.com LLC (collectively "Defendant") relating to text messages sent by Defendant (the "Text Messages"). The Plaintiff claims that Defendant sent the Text Messages in violation of the Washington State Consumer Protection Act. Defendant denies all of the claims and says it did not do anything wrong.

**Who is included?** Defendant's records show you are an individual who may have received a text message from Defendant and, therefore, you may be included in this Settlement as a "Settlement Class Member."

**Settlement benefits.** The Settlement provides two types of benefits to Settlement Class Members: 1) payment of between \$120 and \$1,500, depending on the number of claims received; and 2) six free leads, valued at \$50 each, from Defendant, which provides leads for contractors.

**The only way to receive a Payment is to file a Claim.** To get a Claim Form or file online, visit the website or call 1-XXX-XXX-XXXX. The claim deadline is Month Day, 2021. The website and toll-free number also have information on how to redeem your free leads.

**Other options.** If you do nothing, you will remain in the class, you will not be eligible for a payment (but remain eligible to redeem your six free leads), and you will be bound by the decisions of the Court and give up your rights to sue Defendant for the

claims resolved by this Settlement. If you do not want to be legally bound by the Settlement, you must exclude yourself by Month Day, 2021. If you stay in the Settlement, you may object to it by Month Day, 2021. A more detailed notice is available to explain how to exclude yourself or object. Please visit the website at [WEBSITE URL] or call 1-XXX-XXX-XXXX for a copy of the more detailed notice. On Month Day, 2021, the Court will hold a Final Approval Hearing to determine whether to approve the Settlement, Class Counsel's request for attorneys' fees, costs, and expenses of up to 30 percent of the Total Settlement Value of \$1,529,000 and a service award of \$5,000 for the Representative Plaintiff. You or your own lawyer, if you have one, may ask to appear and speak at the hearing at your own cost, but you do not have to. This is only a summary. For more information, call or visit the website below.

[NAME OF SETTLEMENT]  
[ADDRESS]  
[TOLL-FREE NUMBER]

[WEBSITE]  
[EMAIL]

PLEASE DO NOT CONTACT THE COURT OR THE COURT CLERK'S OFFICE

To unsubscribe, please click on the following link: [unsubscribe](#)

# Exhibit B

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