

Sworn Declaration of [REDACTED]

1. My name is [REDACTED] I was born on [REDACTED] I live in Jermyn, Pennsylvania.
2. I began working for Maid-Rite Specialty Foods in Dunmore, Pennsylvania, in April 2019. Initially, I was contracted through a temp agency. In September 2019, the company hired me directly.
3. I work in the part of the plant that processes cooked meats. I process meatballs, sausages, chicken wings, and other meat products.
4. In March 2020, at the beginning of the COVID-19 pandemic, there were rumors at the Maid-Rite plant that Maid-Rite workers had been infected with COVID-19.
5. Throughout mid-March, workers asked Maid-Rite management whether anyone had been infected with COVID-19, whether anyone at Maid-Rite had been exposed to COVID-19, and whether precautions would be taken to protect us workers from future exposure to COVID-19.
6. While many conversations about these questions happened with multiple supervisors, in my recollection, the person most directly asked was Dave Hollander. I personally asked Dave Hollander if people had been infected, and I know some of my colleagues asked him as well. He told me that nobody had been infected, and that the plant was going to continue operating like normal.
7. As far as I could tell, work continued as normal.
8. On Friday, March 20, 2020, I started to feel COVID-19 symptoms. I had a fever, body aches, and chills. Hollander must have heard that I was feeling sick, and he called me the next day. I told him I was having COVID-19 symptoms. I did not show up for work the next Monday.
9. I scheduled a COVID-19 test for March 22, 2020. At some point before actually getting the test, I told Hollander that it had been scheduled.
10. On March 25, 2020, I received a positive test result, telling me that I did have COVID-19. The same day, I told Hollander about my test result.
11. I also told some of my coworkers about these events, including that I was suffering COVID-19 symptoms, that I was going to get a test, and that my test came back positive.
12. Because I told my coworkers about my situation, my coworkers directly asked Hollander about me. They told me they asked him whether it was true I had been staying home because I had COVID-19 symptoms, and, once I got my positive test result, they asked whether I had tested positive for COVID-19.

13. Hollander told them that it was not true that I was sick. It made me upset and angry to know that my coworkers had asked Hollander about me, and he had lied to them. It made me feel like I couldn't trust Hollander or Maid-Rite.
14. I was out of work until April 16, but then returned and continued working. I was subsequently injured in an unrelated incident in late May, and have been unable to work since then.
15. My wife, 3-year-old son, great grandmother-in-law, mother-in-law, and brother-in-law, were all also infected with COVID-19. I believe I infected all of them.
16. Although my wife has recovered, at her worst moments with COVID-19, she was close to death. There were moments when I did not think she would make it.
17. I know at least 5 people at Maid-Rite who got infected with COVID-19. I know at least 1 person at Maid-Rite who was hospitalized. I have heard about family members of Maid-Rite workers who have died from COVID-19, but I do not know those people personally.
18. During the time I was at Maid-Rite, the company did not put up any plastic dividers or barriers between workers on the workfloor.
19. During the time I was at Maid-Rite, the company did not put up any signs or indicators on the floor to tell workers to stay 6 feet apart from one another while working, or to indicate where to stand in order to maintain 6 feet in distance between workers while on the line.
20. During the time I was at Maid-Rite, after the pandemic began, the company implemented a bonus system that encouraged us workers to show up for work when we were sick. If we worked every day from Monday through Saturday without missing a day, we received a \$300 bonus payment. If you missed any day during the week—for any reason, including illness—you did not receive the bonus.
21. During the time I was at Maid-Rite, I was provided a single face-mask. The mask did not fit me. It was made of thin, white fabric, that got dirty quickly—especially when I worked with chicken wings. I could not reuse it because it got so dirty and because it did not fit me, so I had to purchase my own masks outside of work.
22. During the time I was at Maid-Rite, the area where we clocked-in at the beginning of shifts was very crowded and congested. It was impossible to keep my distance from my coworkers there. During the pandemic, while I was there, Maid-Rite made no changes to the clock-in protocol.



Signature

7/30/2020

Date