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NO. 94593-4

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

LAWRENCE HILL, ADAM WISE, and ROBERT MILLER, on behalf of
themselves and all persons similarly situated,

Plaintiffs/Cross-Petitioners,

v.

GARDA CL NORTHWEST, INC., f/k/a AT SYSTEMS, INC.
a Washington Corporation,

Defendant/Cross-Respondents

**AMICUS CURIAE BRIEF OF THE WASHINGTON
EMPLOYMENT LAWYERS ASSOCIATION**

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I. INTRODUCTION AND INTEREST OF AMICUS CURIAE

The Plaintiffs, nearly 500 employees of Garda CL Northwest, Inc. (“Garda”), an armored vehicle company, successfully sued Garda for denying them meal periods and rest breaks guaranteed under Washington's Industrial Welfare Act, chapter 49.12 RCW, and Minimum Wage Act, chapter 49.46 RCW. *See Hill v. Garda*, 198 Wn. App. 326, 335, 394 P.3d 390 (2017). The trial court awarded \$4,209,596.61 in back pay damages, \$1,668,2356.62 in double damages, and \$2,350,255.63 in prejudgment interest. *Id.* at 338-39. Garda appealed.

In relevant part, the Court of Appeals affirmed the lower court's ruling that Garda violated Plaintiffs' rights to meal and rest breaks. *Id.* at 353-59. It reversed the lower court's award of double damages for meal breaks on the basis that, while Garda violated the meal break requirement, it did not willfully violate the requirement. *Id.* at 360. The Court of Appeals also reversed the lower court's award of prejudgment interest on the rest break violations, *id.* at 336, holding that both prejudgment interest and double damages are not appropriate because “both compensate the Plaintiffs for harm due to a delayed payment,” *Id.* at 364. Garda filed a Petition for Review and Plaintiffs filed a Cross Petition for Review. The Court granted only Plaintiffs' Cross Petition.

The Washington Employment Lawyers Association (“WELA”) is an organization of approximately 200 lawyers licensed to practice law in Washington. WELA advocates in favor of employee rights in recognition

that employment with fairness and dignity is fundamental to the quality of life and a just society. WELA is a chapter of the National Employment Lawyers Association. WELA has appeared in numerous cases before this Court involving employee rights.

II. SUMMARY OF ARGUMENT

State wage and hour laws play a fundamental role to ensure that workers in the State of Washington are fairly compensated for all work performed. Moreover, rest and meal breaks are critical to enhance worker safety. Although individual claims for wage and hour violations (“wage theft”) may be small, the total amount denied to a class of workers can be substantial. Employers therefore have a strong incentive to deny even small amounts of money due each employee.

Contrary to the holding of the Court of Appeals, the purpose of prejudgment interest and exemplary damages are very different. Exemplary damages are intended as a penalty and prejudgment interest is intended to compensate for the delay in payment.

In this case, the delay in payment has been extraordinarily long. The wages due Plaintiffs predated the filing of the Complaint by three years, and it was over six and a half years from the date the Complaint was filed in February 2009 until the Superior Court entered judgment on November 9, 2015. Practically, prejudgment interest prevents employers from enjoying an interest-free loan at their employees’ expense and promotes settlements by discouraging defendants from delaying payments to injured plaintiffs. In

long and contentious litigation, such as this one, prejudgment interest may comprise a very significant portion of the overall recovery and, therefore, be a central issue in the litigation.

This Court should recognize that wage theft is a commonplace occurrence, and that employers should not be allowed to gain the financial advantage of using money over time which rightfully should have been paid to its employees.

III. ARGUMENT

A. Wage Theft is Pervasive and Deprives Workers of Essential Income.

State wage and hour laws “play a crucial role in protecting workers’ rights and creating a level playing field for businesses.”¹ The mere existence of these laws, however, does not automatically mean the standards they establish are followed. Many workers, especially the more institutionally vulnerable, such as noncitizens, people of color, and women, are unaware of their rights or unable to access enforcement mechanisms.² Employers may evade detection through the “manipulation or suppression of record-keeping,” or, instead, they may choose to defy the law outright by “simply integrating noncompliance into ordinary business operations.”³

¹ Jacob Meyer & Robert Greenleaf, *Enforcement of State Wage and Hour Laws: A Survey of State Regulators*, National State Attorneys General Program (April 2011), at p. 7. (https://web.carpenters.org/Libraries/AApril_Merlo/Enforcement_of_State_Wage_and_Hour_Laws-Columbia_Univ.sflb.ashx).

² Gleeson, Sharon. *Precarious Claims: The Promise and Failure of Workplace Protections in the United States*. University of California Press (2016) at p. 53.

³ *Id.*

When wage and hour laws are unenforced, it creates a regulatory “race to the bottom” by states as they compete to attract businesses.⁴

Violation of both federal and state wage and hour laws (“wage theft”) by employers across the United States is pervasive and well documented.⁵ Wage theft takes many forms: nonpayment of overtime, sub-minimum wage, delayed or nonpayment of wages, misclassification of employees as independent contractors, confiscation of tips and service charges, illegal paycheck deductions, and failure to grant breaks or leave. In Washington state from 2009-2013, approximately 15,000 wage theft claims were reported to Labor and Industries.⁶ The average amount claimed was approximately \$3,000.⁷ Similarly, a national three-city survey found that the average worker lost \$51 *each week* to wage violations, out of average weekly earnings of \$339; this translates into wage theft of 15% of earnings.⁸ Nationally, about \$933 million was *recovered* for wage theft victims in 2012, of the estimated \$50 billion in wage violations committed.⁹

⁴ Meyer and Greenleaf, at p. 5.

⁵ *Id.*

⁶ Sederbaum, I. M. *Wage Theft in Washington: An Examination of Labor & Industries Claims 2009-2013* (2014), at p. 21. https://depts.washington.edu/pcls/documents/research/Sederbaum_Wage.pdf

⁷ *Id.*

⁸ Annette Bernhardt, Ruth Milkman, & Nik Theodore, *Broken Laws, Unprotected Workers: Violations of Employment and Labor Laws in America's Cities*, New York, New York: National Employment Law Project, (2009) at p. 4. <http://www.nelp.org/content/uploads/2015/03/BrokenLawsReport2009.pdf>

⁹ Meixell, Brady and Ross Eisenbrey. *An epidemic of wage theft is costing workers hundreds of millions of dollars a year*. Economic Policy Institute. Issue Brief #385 (Sept. 11, 2014), p. 2.

Victims of wage theft are disproportionately low-wage workers, women and youths, African Americans, Latinos and immigrant workers.¹⁰

With respect to meal break violations, a landmark survey published in 2009 revealed that 69 percent of employees who were legally entitled to a meal break experienced one or more meal break violations in the previous work week.¹¹ These violations were prevalent in a variety of industries, such as restaurants and hotels, personal and repair services, private households, apparel and textile manufacturing, warehousing, and retail stores.¹²

B. The Purpose of Prejudgment Interest is Very Different from the Purpose of Exemplary Damages.

A trial court's award of prejudgment interest is reviewed for abuse of discretion. *Pannell v. Food Servs. of Am.*, 61 Wn. App. 418, 449, 810 P.2d 952, 815 P.2d 812 (1991), *review denied*, 118 Wn.2d 1008 (1992). Here, it would have been an abuse of discretion to deny prejudgment interest.

Washington law historically has treated prejudgment interest as a matter of right when a claim is liquidated. *See Colonial Imports v. Carlton Northwest, Inc.*, 83 Wn. App. 229, 245, 921 P.2d 575 (1996). A liquidated

¹⁰ Minkler, M., Salvatore, A. L., Chang, C., Gaydos, M., Liu, S. S., Lee, P. T., Krause, N. (2014). *Wage theft as a neglected public health problem: An overview and case study from San Francisco's Chinatown district*. American Journal of Public Health, 104 (6), 1010-20, at 1010.; Bernhardt et al. at p. 5; Gleeson, Sharon. *Precarious Claims: The Promise and Failure of Workplace Protections in the United States*. University of California Press (2016) at p. 53.

¹¹ Bernhardt, et al. at p. 3.

¹² Bernhardt, et al. at p. 4.

claim exists when “the amount of prejudgment interest can be determined from the evidence with exactness and without reliance on opinion or discretion.” *Bostain v. Food Express, Inc.*, 159 Wn.2d 700, 723, 153 P.3d 846 (2007). “A dispute over the claim, in whole or in part, does not change the character of a liquidated claim to unliquidated.” *Id.* In this case, Garda does not dispute that Plaintiffs’ claim is for damages is liquidated.

Contrary to the ruling by the Court of Appeals, prejudgment interest and double damages do not “both compensate the Plaintiffs for harm due to a delayed payment.” *See Hill*, 198 Wn. App. at 364. An award of prejudgment interest is based on the principle that when a defendant retains money that is owed to another, he should be charged interest upon it. *Hansen v. Rothaus*, 107 Wn.2d 468, 473, 730 P. 2d 662 (1986). The plaintiff should be compensated for the “use value” of the money representing his damages for the period of time from his loss to the date of judgment. *Id.*; *see also Bostain*, 159 Wn.2d at 723 (affirming prejudgment interest on overtime awards under the Washington Minimum Wage Act). “In effect, an award of prejudgment interest compels a party that wrongfully holds money to disgorge the benefit.” *Mahler v. Szucs*, 135 Wn.2d 398, 429, 957 P. 2d 632 (1998). “[A]n award of prejudgment interest is in the nature of preventing the unjust enrichment of the defendant who has wrongfully delayed payment.” *Polygon Northwest Co. v. American Nat. Fire Ins. Co.*, 143 Wn. App. 753, 793, 189 P. 3d 777 (2008) (citing 1 DAN B. DOBBS, LAW OF REMEDIES § 3.6(3), at 348-49 (2d ed.1993) (“in many cases the

interest award is necessary to avoid unjust enrichment of a defendant who has had the use of money or things which rightly belong to the plaintiff”).

Exemplary damages awarded under RCW 49.52.050 and .070, on the other hand, constitutes a penalty. “The payment of wages holds a preferential statutory position, highlighted by the imposition of personal liability for exemplary damages, costs, and reasonable attorney fees as a penalty for the willful failure to pay wages owed.” *Morgan v. Kingen*, 166 Wn.2d 526, 538, 210 P.3d 995 (2009). *See also Schilling v. Radio Holdings, Inc.*, 136 Wn.2d 152, 157-58, 961 P.2d 371 (1998) (“The Legislature has evidenced a strong policy in favor of payment of wages due employees by enacting a comprehensive scheme to ensure payment of wages, including the statutes at issue here which provide both criminal and civil penalties for the willful failure of an employer to pay wages”).

In this case, the harm inflicted on Plaintiffs is substantial. The amount of back pay damages equals \$4,209,596.61, *Hill*, 198 Wn. App. at 339, and the delay in payment will exceed nine years before full restitution is made. Not only are Plaintiffs entitled to be compensated for the “use value” of this money, the Defendant would unjustly enriched if prejudgment interest is denied. Moreover, the denial of prejudgment interest will reward long and contentious litigations and discourage settlements.

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C. The Award of Prejudgment Interest is Especially Important When Considering the Impact of Compensation Delayed over Years of Litigation.

1. The procedural history of this case reflects a long and contentious litigation with significant delays.

In February 2009, Plaintiffs filed a class action lawsuit alleging, *inter alia*, that Garda failed to provide them with legally sufficient rest break or meal periods. *Hill v. Garda*, 169 Wn. App. 684, 688, 281 P.3d 334 (2012). The parties agreed to delay the litigation during the adjudication of *Pellino v. Brinks*, which presented similar claims regarding meal and rest breaks. *Id.* at 689. After an unsuccessful mediation, Plaintiffs moved for certification in March 2010, and at Garda's request the hearing for certification was delayed three times. *Id.* On July 1, 2010, Garda moved to compel arbitration. *Id.* The employees argued that arbitration was waived because Garda had delayed 19 months before filing its motion. Class arbitration was ordered by the trial court and the parties filed cross motions for discretionary review. *Id.* On July 30, 2012, the Court of Appeals reversed the trial court's order compelling class arbitration and remanded for arbitration on an individual basis. *Id.* at 688.

On February 6, 2013, this Court granted review. *Hill v. Garda*, 176 Wn.2d 1010, 297 P.3d 706 (2013). On September 12, 2013, this Court held that the arbitration clause relied upon by Garda was unconscionable and reversed the Court of Appeals. *Hill*, 179 Wn.2d 47, 50, 306 P.3d 635 (2013). A petition for certiorari to the United States Supreme Court was denied. *Garda CL Northwest, Inc., v. Hill*, 134 S.Ct. 2821 (2014).

On remand, Garda moved for summary judgment on the ground that the Plaintiff' claims were preempted by section 301 of the LMRA or, in the alternative, that the Plaintiffs had waived their right to meal breaks through their CBAs. *Hill v. Garda*, 198 Wn. App. 326, 338, 394 P.3d 390 (2017). The trial court denied Garda's motion. *Id.* In December 2014, Garda received permission to amend its answer to add the affirmative defense that the FAAAA preempted the Plaintiffs' claims. *Id.* Garda moved for summary judgment on this preemption argument and the trial court denied it. *Id.* Garda then moved unsuccessfully to decertify the class. *Id.* The Plaintiffs moved for partial summary judgment on the issues of liability and their entitlement to double damages. *Id.* The trial court granted the motion as to liability but denied summary judgment on double damages. *Id.* In December 2015, final judgment was entered in favor of Plaintiffs and Garda again appealed. *Id.* On March 27, 2017, the Court of Appeals affirmed in part and reversed in part. *See* 198 Wn. App. 326.

All parties are entitled to zealously prosecute claims or defend claims brought against them. Neither party, however, should be allowed to profit financially from the long-associated delays. The denial of prejudgment interest allows the employer to profit at the expense of the employee.

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2. Plaintiffs should be compensated for the deferred payment of wages through the court’s award of prejudgment interest.

Wage violations directly result in compensation that is deferred, if ever recovered at all. The losses suffered by Plaintiffs in this case started to accrue in February 2006, three years before the Complaint was filed. Many workers, including hourly workers whom the Industrial Welfare Act specifically protects, bridge income gaps through “payday loans” and credit card debt, both of which carry higher interest rates than the 12% prejudgment interest rate.¹³ Moreover, wage theft is a major contributor to low income, which itself is shown to have negative health consequences.¹⁴ In addition, workers who miss rest and meal breaks face greater risk of work-related accidents and increased stress; this is especially true for low-wage workers who often perform manual labor.¹⁵ There is no basis for

¹³ Washington State Department of Financial Institutions, *2016 Payday Lending*, p.4, <https://dfi.wa.gov/sites/default/files/reports/2016-payday-lending-report.pdf>. The average monthly income of a payday loan borrower is \$3,121. *Id.* at p.6. Credit card and other forms of credit generally are not subject to interest rate limitations. *See* Ch. 19.52 RCW; *Bell v. Muller*, 129 Wn. App. 177, 188, 118 P.3d 405 (2005).

¹⁴ Minkler et al. *supra*. Studies also suggest that poverty is the leading cause of generalized anxiety disorder, Baer, J.C., Kim, M., Wilkenfeld, B. *Is it Generalized Anxiety Disorder or Poverty? An Examination of Poor Mothers and Their Children* Child Adolesc. Soc. Work J. (2012) 29:345-55, and that food insecurity contributes to a myriad of health problems, Gunderson & Ziliak, *Food Insecurity and Health Outcomes*, Health Affairs, Vol. 34, No. 11 (November 2015).

¹⁵ *Murphy v. Kenneth Cole Prod.*, 155 P.3d 284, 296, 40 Cal.4th 1094 (Cal. 2007) (citing Tucker et al, *Rest Breaks and Accident Risk*, 361 The Lancet, Issue 9358, p. 680 (Feb. 22, 2003); Dababneh et al., *Impact of Added Rest Breaks on the Productivity and Well Being of Workers*, 2 Ergonomics, pp. 164-174 (2001); Kenner, *Working Time, Jaeger and the Seven-Year Itch*, 11 Colum. J. Eur. L. 53, 55 (2004/2005)). Ensuring regular meal breaks counteracts fatigue, provides relief from stress, prevents injuries, and helps to maintain a safe and healthy workplace. In a workday “devoid of real breaks,” workers do not “think as clearly [or] logically,” which leads to sickness, lower quality of work, and a decrease in reaction time. Tony Schwartz, *The Personal Energy Crisis*, N.Y. TIMES (Jul. 24, 2011).

denying Plaintiffs of the statutory remedy of prejudgment interest for lost wages simply because their employer acted willfully in breaking the law.

IV. CONCLUSION

The Court should reverse the Court of Appeals' denial of prejudgment interest.

Dated this 12th day January, 2018.

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