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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN**

MARIA SANCHEZ, as an individual and
on behalf of all others similarly situated,

Plaintiffs,

vs.

LODI MEMORIAL HOSPITAL
ASSOCIATION, INC., a California
corporation; ADVENTIST HEALTH
SYSTEM/WEST, a California corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: STK-CV-UOE-2019-09557

(Assigned to the Hon. Roger Ross, Dept. 11B)

**DECLARATION OF KRISTEN AGNEW IN
SUPPORT OF PLAINTIFFS' MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: November 3, November 4, November 5,
November 6, or November 10, 2020

Time: 9:00 a.m.

Dept.: 11B

Complaint Filed: July 24, 2019

FAC Filed: October 10, 2019

SAC Filed: August 28, 2020

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I, Kristen Agnew, declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am with the law firm Diversity Law Group, P.C., counsel of record for Plaintiff Maria Sanchez, Eric Ridgeway, Michelle Bueno, Cindy Javier, Deborah Patterson, Monica Barajas, and Mary Gallegos (collectively, “Plaintiffs”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. From the inception of the case, Plaintiffs' Counsel have zealously represented the interests of Plaintiffs and the PAGA Members.

3. I strongly believe that Plaintiffs can prevail at trial. However, I also believe in the fairness of the settlement. After taking into account sharply disputed factual and legal issues involved in this litigation, the risks attending further prosecution, and the substantial benefits to be received pursuant to the compromise and settlement of the litigation, I have concluded that settlement on the terms set forth in the PAGA Representative Action Settlement Agreement and Release (“Settlement Agreement”) is appropriate and in the best interests of Plaintiff and the aggrieved employees.

4. My qualifications are as follows: I was the 2003 recipient of the Spelman Presidential Scholarship to Emory University School of Law. During law school, I was a summer associate at the law firm of Sonnenschein, Nath and Rosenthal, and clerked with the Atlanta office of the Equal Employment Opportunity Commission. I received my J.D. from Emory University in 2006 and was admitted to the California Bar in December 2006. Following law school, I was an associate at Sonnenschein from September 2006 to May 2009.

5. Since 2009, my primary area of practice has been employment litigation. I have practiced law at two preeminent employment defense firms. From May 2009 to June 2011, I was an associate at Ogletree, Deakins, Nash, Smoak & Stewart, P.C. I was also an associate, and then senior associate, in the labor and employment practice group of Seyfarth Shaw, LLP from June 2011 to May 2016. At both Ogletree and Seyfarth, I represented a wide array of fortune 500 companies in employment litigation in both state and federal courts, as well as before

1 government agencies, including the California Department of Labor. My practice included the
2 defense of single plaintiff and multi-plaintiff lawsuits involving claims under the California Fair
3 Employment and Housing Act, the California Labor Code and the Fair Labor Standards Act. I
4 also handled a number of wage and hour class actions.

5 6. In June 2016, I joined Diversity Law Group, P.C. where I spend most of my time
6 handling employment cases. I primarily represent employees.

7 7. I served as the lead associate on a number of wage and hour class actions,
8 including *Martha Cardenas v. Gold's Gym*, Los Angeles County Superior Court Case No.
9 BC445112; *Nathaniel Werner v. Crown Equipment Corporation*, Los Angeles County Superior
10 Court Case No. BC439428; *Christopher Williams v. Allstate Insurance Co.*, Los Angeles County
11 Superior Court Case No. BC382577; *Hwang v. Caltech*, Los Angeles County Superior Court
12 Case No. BC464894; *Melissa Roberts v. Zale Delaware, Inc.*, Los Angeles Superior Court Case
13 No. BC523610; *Michael Oliver v. Konica Minolta Business Solutions U.S.A., Inc.*, Santa Clara
14 County Superior Court Case No. 114-CV-263183; *Tessa Hodge v. Zale Delaware, Inc., d/b/a*
15 *Piercing Pagoda*, San Bernardino Superior Court Case No CIVVS1301632; *Warren v. Paychex,*
16 *Inc.*, N.D. Cal. Case No. 3:10-cv-02006; *Tapia v. Zale Delaware Inc. et al*, S.D. Cal. Case No.
17 3:13-cv-01565; and *Benjamin Burgess et al v. Tesoro Refining and Marketing Company et al*,
18 C.D. Cal. Case No. 2:10-cv-05870.

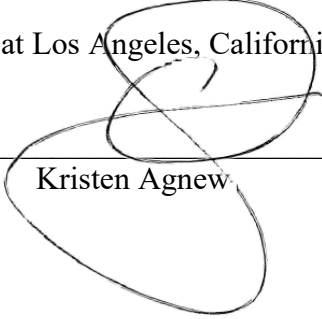
19 8. I have been approved as class counsel in a number of class actions by the Superior
20 Courts of California and United States District Courts, including: *Antonio Becerra-Mata v. PSC*
21 *Industrial Outsourcing, LP*, San Benito County Superior Court Case No. CU-15-00030; *Andrew*
22 *Vasquez v. Earthbound Farm, LLC*, San Benito County Superior Court Case No. CU-17-00171;
23 *Fransisco Pulido v. Westrock Services, Inc.*, San Benito County Superior Court Case No. CU-18-
24 00074; *Kosal So v. Owens-Brockway Glass Container, Inc.*, Los Angeles County Superior Court
25 Case No. BC608609; *John Obiols v. Lockheed Martin Corporation*, Santa Clara County Superior
26 Court Case No. 17CV314178; and *Eric Chavez v. Converse, Inc.*, N.D. Cal. Case No. 15-cv-
27 03746-NC

28 9. I also second chaired two jury trials where I represented the prevailing defendant.

1 Both cases involved employees who brought claims against their former employers pursuant to
2 the Fair Employment & Housing Act. The cases are: *Jeff Cowell v. Eaton Aerospace LLC et al*,
3 Los Angeles County Superior Court Case No. BC401543; and *Richard Gulden v. Pratt &*
4 *Whitney Rocketdyne Inc. et al.*, Los Angeles County Superior Court Case No. BC468909.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct.

7 Executed on this 5th day of October 2020, at Los Angeles, California.

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Kristen Agnew