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Attorneys for Plaintiff Charles Rodriguez, on behalf
of himself and all others similarly situated

Additional counsel listed on next page.

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES**

CHARLES RODRIGUEZ, an individual,
on behalf of himself and all others similarly
situated,

Plaintiff,

v.

U.S. BANK NATIONAL ASSOCIATION,
dba U.S. Bank; and DOES 1 through 100,
inclusive

Defendants.

Case No. BC617356

CLASS ACTION

Assigned to: Hon. Amy D. Hogue; Dept. 7

**DECLARATION OF KRISTEN AGNEW IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT AND PAGA
SETTLEMENT**

Date: March 9, 2022

Time: 11:00 a.m.

Dept.: 7

Action filed: April 15, 2016

Related Case: 19STCV17516

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
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Attorneys for Plaintiff Ali Malik, Atefeh Yousefi,
and all others similarly situated.

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I, Kristen M. 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 Named Plaintiffs Ali Malik and Atefeh Yousefi (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. I have zealously represented the interests of the class throughout this litigation. The settlement was obtained for the benefit of the class, as opposed to the individual plaintiffs.

3. I have been approved as class counsel on a number of prior cases, have litigated numerous other class action cases, and am competent to represent the class. Based on my review of all the information, and based on my experience in class action litigation, I believe this settlement to be fair, adequate and reasonable.

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

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

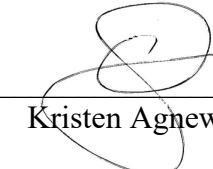
3 7. I served as the lead associate on a number of wage and hour class actions, including
4 *Martha Cardenas v. Gold's Gym*, Los Angeles County Superior Court Case No. BC445112;
5 *Nathaniel Werner v. Crown Equipment Corporation*, Los Angeles County Superior Court Case No.
6 BC439428; *Christopher Williams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

14 8. I have been approved as class counsel in a number of class actions by the Superior
15 Courts of California and United States District Courts, including: *Antonio Becerra-Mata v. PSC*
16 *Industrial Outsourcing, LP*, San Benito County Superior Court Case No. CU-15-00030; *Eric*
17 *Chavez v. Converse, Inc.*, N.D. Cal. Case No. 15-cv-03746-NC and *Kosal So v. Owens-Brockway*
18 *Glass Container, Inc.*, Los Angeles County Superior Court Case No. BC608609.

19 9. I also second chaired two jury trials where I represented the prevailing defendant.
20 Both cases involved employees who brought claims against their former employers pursuant to the
21 Fair Employment & Housing Act. The cases are: *Jeff Cowell v. Eaton Aerospace LLC et al*, Los
22 Angeles County Superior Court Case No. BC401543; and *Richard Gulden v. Pratt & Whitney*
23 *Rocketdyne Inc. et al.*, Los Angeles County Superior Court Case No. BC468909.

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

26 Executed on November 29, 2021, at Los Angeles, California.

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Kristen Agnew

PROOF OF SERVICE

I am employed in the office of a member of the bar of this Court at whose direction this service was made. I am over the age of 18 and not a party to the within action; my business address is 9327 Fairway View Place, Ste. 100, Rancho Cucamonga, California 91730.

On November 29, 2021, I served the foregoing document described as **DECLARATION OF KRISTEN AGNEW IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND PAGA SETTLEMENT** on the interested parties in this action as follows:

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SERVICE BY CASEANYWHERE

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Los Angeles, CA 90071
Attorneys for Plaintiff Ali Malik and Atefeh Yousefi
SERVICE BY EMAIL

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PROOF OF SERVICE

1 I am “readily familiar” with the firm’s practice of services of process. Under that
2 practice, this document would be deposited:

3 **(VIA E-SERVICE)** I caused the document(s) to be served by CASEANYWHERE
4 by transmitting a true and correct copy to CASEANYWHERE to serve the parties listed
5 above; and

6 **(BY EMAIL)** I caused the document(s) to be sent to the person(s) at the electronic
7 address(es) listed above.

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

10 Executed on November 29, 2021 at Rancho Cucamonga, California.

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12 _____
13 Yvonne Medina
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