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Attorneys for Plaintiff, the Class, and Aggrieved Employees

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

NICOLA ROMANO, as an individual and
on behalf of all others similarly situated,

Plaintiffs,

vs.

SSA TERMINALS, LLC, a Delaware
limited liability company; and DOES 1
through 50, inclusive,

DEFENDANTS.

Case No.: 20STCV29048

[Assigned for all purposes to the Hon. William F.
Highberger, Department 10]

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

Date: April 22, 2022

Time: 11:00 a.m.

Dept.: 10

Complaint Filed: July 30, 2020

Trial Date: None Set

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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 Romano (“Plaintiff”). I have personal knowledge of the facts set forth below and if called upon I could and would do so competently.

3. I strongly believe that Plaintiff can prevail at trial. However, I also believe in the fairness of the settlement, which is based on factoring in the inherent risks in drawn-out litigation and the specific risks that a class might not be certified and/or that Plaintiff could fail to establish liability, as well as the possibility of appeals.

5. Plaintiff's counsel has been approved as class counsel in a number of wage and hour class actions and have extensive litigation experience.

7. Since 2009, my primary area of practice has been employment litigation. I have

1 practiced law at two preeminent employment defense firms. From May 2009 to June 2011, I was
2 an associate at Ogletree, Deakins, Nash, Smoak & Stewart, P.C. I was also an associate, and then
3 senior associate, in the labor and employment practice group of Seyfarth Shaw, LLP from June
4 2011 to May 2016. At both Ogletree and Seyfarth, I represented a wide array of fortune 500
5 companies in employment litigation in both state and federal courts, as well as before
6 government agencies, including the California Department of Labor. My practice included the
7 defense of single plaintiff and multi-plaintiff lawsuits involving claims under the California Fair
8 Employment and Housing Act, the California Labor Code and the Fair Labor Standards Act. I
9 also handled a number of wage and hour class actions.

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

12 9. I served as the lead associate on a number of wage and hour class actions,
13 including *Martha Cardenas v. Gold's Gym*, Los Angeles County Superior Court Case No.
14 BC445112; *Nathaniel Werner v. Crown Equipment Corporation*, Los Angeles County Superior
15 Court Case No. BC439428; *Christopher Williams v. Allstate Insurance Co.*, Los Angeles County
16 Superior Court Case No. BC382577; *Hwang v. Caltech*, Los Angeles County Superior Court
17 Case No. BC464894; *Melissa Roberts v. Zale Delaware, Inc.*, Los Angeles Superior Court Case
18 No. BC523610; *Michael Oliver v. Konica Minolta Business Solutions U.S.A., Inc.*, Santa Clara
19 County Superior Court Case No. 114-CV-263183; *Tessa Hodge v. Zale Delaware, Inc., d/b/a*
20 *Piercing Pagoda*, San Bernardino Superior Court Case No CIVVS1301632; *Warren v. Paychex,*
21 *Inc.*, N.D. Cal. Case No. 3:10-cv-02006; *Tapia v. Zale Delaware Inc. et al*, S.D. Cal. Case No.
22 3:13-cv-01565; and *Benjamin Burgess et al v. Tesoro Refining and Marketing Company et al*,
23 C.D. Cal. Case No. 2:10-cv-05870.

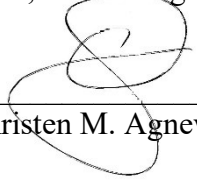
24 10. I have been approved as class counsel in a number of class actions by the Superior
25 Courts of California and United States District Courts, including: *Antonio Becerra-Mata v. PSC*
26 *Industrial Outsourcing, LP*, San Benito County Superior Court Case No. CU-15-00030; *Andrew*
27 *Vasquez v. Earthbound Farm, LLC*, San Benito County Superior Court Case No. CU-17-00171;
28 *Fransisco Pulido v. Westrock Services, Inc.*, San Benito County Superior Court Case No. CU-18-

1 00074; *Kosal So v. Owens-Brockway Glass Container, Inc.*, Los Angeles County Superior Court
2 Case No. BC608609; *John Obiols v. Lockheed Martin Corporation*, Santa Clara County Superior
3 Court Case No. 17CV314178; and *Eric Chavez v. Converse, Inc.*, N.D. Cal. Case No. 15-cv-
4 03746-NC.

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

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

12 Executed on this 30th day of March 2022, at Los Angeles, California.

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