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Attorneys for Plaintiffs Denise Droesch,
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 and other individuals similarly situated

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SUPERIOR COURT FOR THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

DENISE DROESCH; KYONNA
 HARRISON; and JANISHA LEE PRICE
 as individuals and on behalf of other
 aggrieved employees,

Plaintiffs,

vs.

WELLS FARGO BANK, N.A., a United
 States Corporation, and DOES 1 – 10,
 inclusive

Defendants.

CASE NO. 34-2021-00292066-CU-OE-GDS

**DECLARATION OF DENISE
 DROESCH IN SUPPORT OF
 PLAINTIFFS' UNOPPOSED MOTION
 FOR PRELIMINARY APPROVAL OF
 CLASS ACTION SETTLEMENT AND
 PROVISIONAL CLASS
 CERTIFICATION**

[Filed and served concurrently with Notice of
 Motion; Memorandum of Points &
 Authorities; Declarations of Attorneys
 Christina A. Humphrey; Marcus J. Bradley;
 of Plaintiffs Kyonna Harrison; Janisha Lee
 Price; of Settlement Administrator; and
 [Proposed] Order]

Date: November 1, 2024

Time: 9:00 a.m.

Reservation #: A-292066-001

Dept.: 23

Judge: Jill H. Talley

Complaint filed: January 7, 2021

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Attorneys for Plaintiffs Denise Droesch,
Kyonna Harrison, Janisha Lee Price,
and other individuals similarly situated

DECLARATION OF DENISE DROESCH

I, Denise Droesch, declare:

1. I am over the age of 18 and a resident of California. I am one of the named Plaintiffs in the above-captioned case. I have personal knowledge of the facts and statements set forth in this declaration, and if called upon to testify, I could and would competently testify thereto.

2. I am one of the three named Plaintiffs and Class/PAGA representatives in this consolidated action. I have no personal relationship or family ties to my attorneys or any officer of the Court. My attorneys are not working on my behalf in another capacity other than representing me in this lawsuit. This declaration is submitted in support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action and PAGA Settlement and Provisional Class Certification.

3. I worked for Defendant WELLS FARGO BANK, N.A. ("Defendants" or "Wells Fargo"), from approximately December 2019, to approximately March 2020, as an hourly, non-exempt premier phone banker at the Business Banking Call Center operated by Wells Fargo located in Sacramento, California.

4. I have spent a substantial amount of time and energy contributing to the investigation, prosecution and settlement of this case. Since hiring my attorneys in 2020 up through the present date, I have exchanged countless emails and phone calls with my counsel, collected and produced documents, assisted in the investigation, provided declarations, provided deposition testimony on two separate occasions, and assisted in settlement discussion. I also answered multiple sets of discovery and exchanged and reviewed documents in preparation for deposition. I estimate that I have spent 40-50 hours litigating this case.

5. During this entire process, I have always had the best interests of the other employees and the State of California in mind and worked hard on their behalf. My claims in this case are typical of the claims of the other Settlement Class Members and Aggrieved Employees, and I have no conflicts with any of the other Settlement Class Members or Aggrieved Employees.

6. I was also involved in settlement discussions as they occurred throughout this Case and was available during the mediation.

7. As part of the proposed Settlement, I agreed to a full release of claims related to my employment with Wells Fargo, including a waiver of Civil Code section 1542, that extends beyond the release of claims applicable to the Settlement Class members and Aggrieved Employees.

9. I understand that my attorneys will request that the Court award me a Representative Incentive Award of \$2,500 for my service and efforts on the case.

10. I do not have any interest, relationship, or involvement with the proposed *cy pres* recipient, Legal Aid at Work

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

Executed this 4th day of October, 2024, at Sacramento, California.

DocuSigned by:

Denise Drosch

~~0A5C72565980400...~~

Denise Droesch,
Declarant