

Larry W. Lee (State Bar No. 228175)
Max W. Gavron (State Bar No. 291697)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile

WEBBER LAW GROUP
Kelsey A. Webber (State Bar No. 303721)
Kelsey.Webber@WebberLawGroup.com
333 University Ave, Suite 200
Sacramento, California 95825
Telephone: (916) 588-0683

Attorneys for Plaintiff and Aggrieved Employees

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

MICHAEL GIBSON, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

SOUTHWEST TRADERS
INCORPORATED, a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: STK-CV-UOE-2020-10620

(Assigned to the Honorable Erin Guy Castillo,
Dept. 10B)

**DECLARATION OF KELSEY A. WEBBER
IN SUPPORT OF PLAINTIFF'S MOTION
TO APPROVE THE PARTIES'
SETTLEMENT AGREEMENT PURSUANT
TO THE LABOR CODE PRIVATE
ATTORNEYS GENERAL ACT OF 2004**

Date: September 27, 2022;
September 28, 2022;
September 29, 2022;
September 30, 2022; or
October 3, 2022

Time: 9:00 a.m.

Dept.: 10B

DECLARATION OF KELSEY A. WEBBER

I, Kelsey A. Webber, 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 Webber Law Group, counsel of record for Plaintiff Michael Gibson ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I am one of the primary attorneys on this matter. As detailed in the motion for preliminary approval, the Private Attorneys General Act (Labor Code § 2698, et seq) Settlement and Release Agreement ("Settlement Agreement") was the product of negotiation between highly able and experienced attorneys on both sides who possessed the relevant data and extensive legal research which they had carefully analyzed. Plaintiff's counsel engaged in extensive factual investigation before settling, including exchanging informal discovery and reviewing data and other information relevant to valuing this case. I support the settlement as fair, reasonable, and adequate, and in the best interest of the Aggrieved Employees as a whole.

3. I have been approved as class counsel in other wage/hour class actions that have been granted class certification and final approval.

4. My qualifications are as follows: I graduated from Georgetown University Law Center in 2014 and was admitted to the California Bar in 2015. From about June 2015 to about June 2017, I was an attorney at the Velez Law Firm where I represented numerous plaintiffs in employment lawsuits. During this time, Mr. Velez and I obtained a jury verdict, in a single plaintiff, age discrimination case, in the amount of \$4,750,000.00 (*Barbara Anderton v. Bass Underwriters*, Sacramento County Superior Court, Case No. 34-2013-00149236).

5. From about July 2017 to April 2019, I worked as an attorney at Ogletree, Deakins, Nash, Smoak & Stewart, P.C. Ogletree, Deakins is a national employment defense law firm that represents a large number of Fortune 50 companies. During this time, I litigated numerous actions involving wage and hour issues.

6. From about April 2019 to March 2020, I worked as an attorney at Carothers, DiSante, and Freudenberger LLP. Carothers, DiSante, and Freudenberger is a California

1 employment defense law firm that specializes in defending class actions and PAGA cases. During
2 this time, I litigated numerous actions involving wage and hour issues.

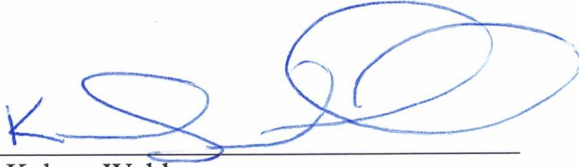
3 7. In March 2020, I founded the Webber Law Group, P.C. At the Webber Law Group.
4 I spend most of my time litigating employment related lawsuits, representing California
5 employees.

6 8. Currently, my office represents plaintiffs in a number of class actions, including
7 but not limited to: *Derek Austin v. BQ Express Inc.* (Sacramento County Superior Court, Case No.
8 34-2021 -00297271); *Wendie Brandt v. Kids Care Dental & Orthodontics* (Sacramento County
9 Superior Court, Case No. 34-2021-00296816); *Paul Gullett v Apple American Group, LLC* (Placer
10 County Superior Court, Case No. S-CV-0045844); *Antonio Jesus Jaramillo De La Cruz v. Weidner*
11 *Property Management, LLC* (Sacramento County Superior Court, Case No. 34-2021-00308697);
12 *James Jones v. TFC Partners, Inc.* (Alameda County Superior Court, Case No. RG21087839);
13 *Gerardo Negrete v. Ace Hardware Corporation* (Placer County Superior Court, Case No. S-CV-
14 0047322).

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

17 Executed on this August 22, 2022, at Sacramento, California.

18
19
20
21
22
23
24
25
26
27
28



Kelsey Webber