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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

JAMIE ELLSWORTH, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

LECLAIR FITNESS II, LLC, a California
limited liability company; LECLAIR
FITNESS III, LLC, a California limited
liability company; LECLAIR FITNESS IV,
LLC, a California limited liability company;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: 34-2021-00295114-CU-OE-GDS

**DECLARATION OF SHAELYN A.
STEWART IN SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS AND
REPRESENTATIVE ACTION
SETTLEMENT**

Date: September 20, 2022
Time: 9:00 a.m.
Dept.: 54

Reservation #: 2658341

Complaint Filed: February 23, 2021
FAC Filed: May 6, 2022
Trial Date: None

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I, Shaelyn A. Stewart, declare as follows.

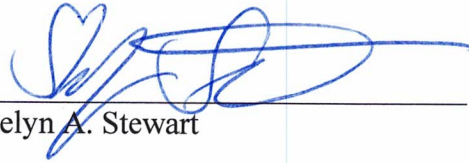
1. I am an attorney at law, duly licensed to practice before all Courts in the State of Virginia, and am with the law firm Webber Law Group, counsel of record for Plaintiff Jamie [REDACTED] ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify, I could and would do so competently.

2. I am one of the primary attorneys on this matter. As detailed in the motion for summary approval, the Joint Stipulation of Class Action and PAGA Settlement and Release (“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 carefully analyzed. Class Counsel engaged in extensive factual investigation before settling, including exchanging informal discovery and reviewing class data and other information relevant to this case. I support the settlement as fair, reasonable, and adequate, and in the best interests of the Class Members as a whole.

My qualifications are as follows: I graduated from McGeorge School of Law in 2016. At McGeorge, I won first place in the UC Davis Asylum & Refugee Law National Moot competition. I also served as a primary editor for the University of the Pacific Law Review. After joining Webber Law Group, P.C., I served as a Judicial Extern in the U.S. District Court for the Eastern District of California. Currently, my office represents plaintiffs in a number of class actions, including but not limited to: *Michael Gibson v. Southwest Traders Incorporated* (San Francisco County Superior Court, Case No. STK-CV-UOE-2020-0010620); *Derek Austin v. BQ Inc.* (Sacramento County Superior Court, Case No. 34-2021-00297271); *Wendie Brandt v. Care Dental & Orthodontics* (Sacramento County Superior Court, Case No. 34-2021-00308697); *Paul Gullett v. Apple American Group, LLC* (Placer County Superior Court, Case No. 34-2021-0045844); *Antonio Jesus Jaramillo De La Cruz v. Weidner Property Management, LLC* (Sacramento County Superior Court Case No. 34-2021-00308697); *James Jones v. TFC Partners, Inc.* (Sacramento County Superior Court, Case No. RG21087839); *Gerardo Negrete v. Ace Hardware* (Placer County Superior Court, Case No. S-CV-0047322).

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

3 Executed on this 22 day of August 2022, at Sacramento, California.

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Shaelyn A. Stewart