

DIVERSITY LAW GROUP, P.C.
Larry W. Lee (State Bar No. 228175)
lwlee@diversitylaw.com
Simon L. Yang (State Bar No. 260286)
sly@diversitylaw.com
515 South Figueroa Street, Suite 1250
Los Angeles, California 90071
Telephone: (213) 488-6555
Facsimile (213) 488-6554

WEBBER LAW GROUP, P.C.
Kelsey A. Webber (State Bar No. 303721)
Kelsey.Webber@WebberLawGroup.com
1610 R Street, Suite 300
Sacramento, California 95811
Telephone: (916) 588-0683

Attorneys for Plaintiff and the Class

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

WENDIE BRANDT, as an individual and on
behalf of all others similarly situated, and as a
private attorney general,

Plaintiff,

vs.

KIDS CARE DENTAL & ORTHODONTICS, a
California corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 34-2021-00296816

[Assigned for all purposes to Department 25,
Hon. Jill H. Talley]

**DECLARATION OF KELSEY A. WEBBER
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: May 5, 2023
Time: 9:00 a.m.
Department: 25

Complaint Filed: September 1, 2021

1 I, Kelsey A. Webber, declare as follows:

2 1. I am an attorney at law, duly licensed to practice before all Courts in the State of California,
3 and am with the law firm Webber Law Group, counsel of record for Plaintiff. I have personal knowledge
4 of the facts set forth below and if called to testify I could and would do so competently.

5 2. I am one of the primary attorneys on this matter. As detailed in the motion for preliminary
6 approval, the Joint Stipulation of Class Action and PAGA Settlement was the product of negotiation
7 between highly able and experienced attorneys on both sides who possessed the relevant data and
8 extensive legal research which they had carefully analyzed. Plaintiff's counsel engaged in extensive
9 factual investigation before settling, including exchanging informal discovery and reviewing data and
10 other information relevant to valuing this case. I support the settlement as fair, reasonable, and adequate,
11 and in the best interest of the Aggrieved Employees as a whole.

12 3. I have been approved as class counsel in numerous other wage/hour class actions that have
13 been granted class certification and final approval, and have been approved as counsel in representative
14 actions under the PAGA.

15 4. My qualifications are as follows: I graduated from Georgetown University Law Center in
16 2014 and was admitted to the California Bar in 2015. From about June 2015 to about June 2017, I was an
17 attorney at the Velez Law Firm where I represented numerous plaintiffs in employment lawsuits. During
18 this time, Mr. Velez and I obtained a jury verdict, in a single plaintiff, age discrimination case, in the
19 amount of \$4,750,000.00 (*Barbara Anderton v. Bass Underwriters*, Sacramento County Superior Court,
20 Case No. 34-2013-00149236).

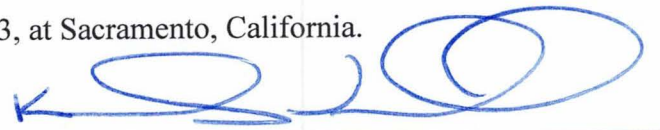
21 5. From about July 2017 to April 2019, I worked as an attorney at Ogletree, Deakins, Nash,
22 Smoak & Stewart, P.C. Ogletree, Deakins is a national employment defense law firm that represents a
23 large number of Fortune 50 companies. During this time, I litigated numerous actions involving wage and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

25 6. From about April 2019 to March 2020, I worked as an attorney at Carothers, DiSante, and
26 Freudenberg LLP. Carothers, DiSante, and Freudenberg is a California employment defense law firm
27 that specializes in defending class actions and PAGA cases. During this time, I litigated numerous actions
28 involving wage and hour issues.

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

3 8. Currently, my office represents plaintiffs in a number of class actions, including but not
4 limited to: *Derek Austin v. BQ Express Inc.* (Sacramento County Superior Court, Case No. 34-2021 -
5 00297271); *Paul Gullett v Apple American Group, LLC* (Placer County Superior Court, Case No. S-CV-
6 0045844); *Antonio Jesus Jaramillo De La Cruz v. Weidner Property Management, LLC* (Sacramento
7 County Superior Court, Case No. 34-2021-00308697); *James Jones v. TFC Partners, Inc.* (Alameda
8 County Superior Court, Case No. RG21087839); *Gerardo Negrete v. Ace Hardware Corporation* (Placer
9 County Superior Court, Case No. S-CV-0047322).

10 I declare under penalty of perjury under the laws of the State of California that the foregoing is
11 true and correct. Executed this ^{10th} day of April 2023, at Sacramento, California.



Kelsey A. Webber