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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 27,
Hon. Jill H. Talley]

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

Date: September 1, 2023
Time: 9:00 a.m.
Department: 27

Complaint Filed: March 18, 2021

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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 an owner of Webber & Egbert Employment Law, P.C. (formerly Webber Law Group, P.C.), counsel of record for Plaintiff Wendie Brandt (“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. My qualifications are as follows:

3. I graduated from Georgetown University Law Center in 2014 and was admitted to the California Bar in 2015. At Georgetown, I had the opportunity to work as a Research Assistant for Professor Anthony E. Cook. During this time, Professor Cook and I researched Social Enterprises throughout the United States in order to determine which Social Enterprise would most benefit the homeless community in the District of Columbia. Subsequently, Professor Cook and I worked with investors to help create a system of low-income housing in Washington D.C. that incorporated the Social Enterprise that we determined would most benefit the homeless community in the District. It was during this time that I began planning to practice in an area of law connected to civil rights. In May 2014, I graduated from Georgetown University Law Center on the Dean's Honor Roll.

4. 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). For my work in this trial, I was nominated for Advocate of the Year by the Capital City Trial Lawyers Association.

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

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

8. Currently, my office represents plaintiffs in a number of class actions, including but not limited to: *Michael Gibson v. Southwest Traders Incorporated* (San Joaquin County Superior Court, Case No. STK-CV-UOE-2020-0010620); *Derek Austin v. BQ Express Inc.* (Sacramento County Superior Court, Case No. 34-2021-00297271); *David Long v. Capitol Compliance Management, LLC* (Sacramento County Superior Court, Case No. 34-2021-00301119-CU-OE-GDS); *Paul Gullett v. Apple American Group, LLC* (Placer County Superior Court, Case No. S-CV-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.* (Alameda County Superior Court, Case No. RG21087839); *Gerardo Negrete v. Ace Hardware Corporation* (Placer County Superior Court, Case No. S-CV-0047322).

9. I have received numerous awards, including being named to the Top 40 Under 40 by the National Trial Lawyers Association in 2020, 2021, and 2022.

10. Based on my independent investigation and evaluation, I am of the opinion that settlement for the consideration and on the terms set forth in the Joint Stipulation of Class Action and PAGA Settlement is fair, reasonable, and adequate and is in the best interests of the Class, in light of all known facts and circumstances and the expenses and risks inherent in litigation.

11. Below is a summary of the hours I have expended in litigating this case to date:

Name	Position	Hours	Rate	Lodestar
Kelsey Webber	Shareholder	5.7	\$650.00	\$3,705.00
TOTAL				\$3,705.00

12. The hours I have spent litigating this case to date include time spent in: meetings/conversations with Plaintiff to discuss the facts and theories of the case, analysis and

1 review of documents provided by Plaintiff to determine viable causes of action; conferences with
2 co-counsel regarding the same; and the drafting and review of settlement documents, including
3 my declarations in support of preliminary and final approval. I believe my hourly rate is justified
4 in light of my experience, and the results I have achieved in the past and in this case.

5 13. In conjunction with litigating this case, my firm has expended costs without
6 reimbursement to date. My firm's costs total \$153.10, which relate to the court filings in this
7 matter. Attached as **Exhibit A** are the invoices and receipts demonstrating the costs for which my
8 firm seeks reimbursement.

9 14. Plaintiff signed a written retainer agreement that governs my firm and my co-
10 counsel's representation of Plaintiff in this action. The written agreement expressly provides that
11 the fees ultimately approved by the Court will be split between counsel. Pursuant to the written
12 agreement, Diversity Law Group will receive two-thirds (2/3) of the legal fees recovered and
13 Webber & Egbert Employment Law, P.C. (formerly Webber Law Group, P.C.) will receive one-
14 third (1/3) of the legal fees recovered. The written agreement advised Plaintiff that the agreement
15 to split legal fees would not increase the fees owed by Plaintiff for Plaintiff's representation.

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

18 Executed on this August 8, 2023, at El Dorado Hills, California.

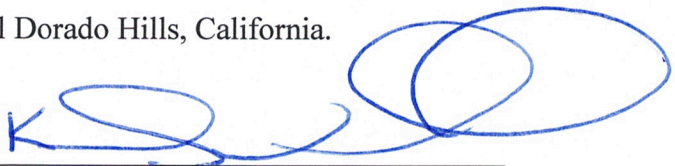
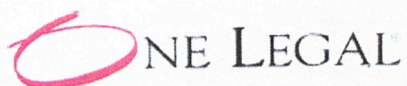
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21 _____
22 Kelsey Webber
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Exhibit A



1400 North McDowell Blvd. Suite 300
Petaluma, CA 94954
1-800-938-8815 ext. 1
TIN: 85-4343705

Credit Card Sale

Date	9/13/2022
Customer	0144453
Credit Sale	04367137
Amount Due	\$0.00

Bill To
Webber Law Group, P.C. 333 University Ave Suite 200 Sacramento CA 95825

One Legal Order Number	18880081
Contact	Kelsey Webber
Attorney Name	Kelsey Webber
Case Title	WENDIE BRANDT
Case Number	34-2021-00296816
Court	Superior Court of California, Sacramento County
Documents	Notice of Change of Address

ONE LEGAL FEES	AMOUNT
Court Filing Service Charge, 1 - 15 Pages	\$70.00
eServe Charge	\$7.00
Convenience Fee†	\$2.27
SUBTOTAL	\$79.27

FEES SUMMARY	AMOUNT
One Legal Fees	\$79.27
TOTAL CHARGED	\$79.27

Past due balance may be charged a late payment fee and/or a late charge of up to 1.5% per month (18% per annum).

† When paying invoices by credit card, a convenience fee will be assessed in accordance with applicable law and Terms of Service accepted at time of order. To avoid these fees, you can choose to pay via ACH.



1400 North McDowell Blvd. Suite 300
Petaluma, CA 94954
1-800-938-8815 ext. 1
TIN: 85-4343705

Credit Card Sale

Date	7/26/2023
Customer	0144453
Credit Sale	05179205
Amount Due	\$0.00

Bill To

Webber Law Group, P.C.
1610 R Street
Suite 300
Sacramento CA 95811

One Legal Order Number	20690580
Contact	Kelsey Webber
Attorney Name	Kelsey Webber
Case Title	WENDIE BRANDT
Case Number	34-2021-00296816
Court	Superior Court of California, Sacramento County
Documents	Notice of Change of Firm Name

ONE LEGAL FEES	AMOUNT
eServe Charge	\$1.00
Court Filing Service Charge, 1 - 15 Pages	\$70.00
Convenience Fee†	\$2.83
SUBTOTAL	\$73.83

FEES SUMMARY	AMOUNT
One Legal Fees	\$73.83
TOTAL CHARGED	\$73.83

Past due balance may be charged a late payment fee and/or a late charge of up to 1.5% per month (18% per annum).

† When paying invoices by credit card, a convenience fee will be assessed in accordance with applicable law and Terms of Service accepted at time of order. To avoid these fees, you can choose to pay via ACH.