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Attorneys for Plaintiff and the Class

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

IKEYEE JACKSON, as an individual and
on behalf of all others similarly situated,

Plaintiffs,

vs.

SAMUEL, SON & CO. (USA) INC., a
Delaware corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: CVRI2101679

(Assigned to the Honorable Harold Hopp, Dept.
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**DECLARATION OF KRISTEN M. AGNEW
IN SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: June 5, 2023
Time: 8:30 a.m.
Dept.: 10

Complaint Filed: March 30, 2021

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I, Kristen Agnew, 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 Diversity Law Group, P.C., counsel of record for Plaintiff Jackson (“Plaintiff”). I have personal knowledge of the facts set forth below and if called by me I could and would do so competently.

2. Based on Class Counsel's independent investigations and evaluations, I am of the opinion that the proposed settlement is fair, reasonable, and adequate, and is in the best interests of the Class Members, in light of all known facts and circumstances, and the expenses and risks of continued litigation. The settlement was negotiated at arm's length and was facilitated by an independent and neutral mediator. Thus, this settlement should be granted final approval.

3. My qualifications are as follows: I was the 2003 recipient of the Spelman
ntial Scholarship to Emory University School of Law. During law school, I was a
r associate at the law firm of Sonnenschein, Nath and Rosenthal, and clerked with the
office of the Equal Employment Opportunity Commission. I received my J.D. from
University in 2006 and was admitted to the California Bar in December 2006. Following
ool, I was an associate at Sonnenschein from September 2006 to May 2009.

4. Since 2009, my primary area of practice has been employment litigation. I have practiced law at two preeminent employment defense firms. From May 2009 to June 2011, I was an associate at Ogletree, Deakins, Nash, Smoak & Stewart, P.C. I was also an associate, and senior associate, in the labor and employment practice group of Seyfarth Shaw, LLP from 2011 to May 2016. At both Ogletree and Seyfarth, I represented a wide array of Fortune 500 companies in employment litigation in both state and federal courts, as well as before government agencies, including the California Department of Labor. My practice included the defense of single plaintiff and multi-plaintiff lawsuits involving claims under the California Fair Employment and Housing Act, the California Labor Code and the Fair Labor Standards Act. I have handled a number of wage and hour class actions.

5. In June 2016, I joined Diversity Law Group, P.C. where I spend most of my time

1 handling employment cases. I primarily represent employees.

2 6. I served as the lead associate on a number of wage and hour class actions,
3 including: *Martha Cardenas v. Gold's Gym*, Los Angeles County Superior Court Case No.
4 BC445112; *Nathaniel Werner v. Crown Equipment Corporation*, Los Angeles County Superior
5 Court Case No. BC439428; *Christopher Williams v. Allstate Insurance Co.*, Los Angeles County
6 Superior Court Case No. BC382577; *Hwang v. Caltech*, Los Angeles County Superior Court
7 Case No. BC464894; *Melissa Roberts v. Zale Delaware, Inc.*, Los Angeles Superior Court Case
8 No. BC523610; *Michael Oliver v. Konica Minolta Business Solutions U.S.A., Inc.*, Santa Clara
9 County Superior Court Case No. 114-CV-263183; *Tessa Hodge v. Zale Delaware, Inc., d/b/a*
10 *Piercing Pagoda*, San Bernardino Superior Court Case No CIVVS1301632; *Warren v. Paychex,*
11 *Inc.*, N.D. Cal. Case No. 3:10-cv-02006; *Tapia v. Zale Delaware Inc. et al*, S.D. Cal. Case No.
12 3:13-cv-01565; and *Benjamin Burgess et al v. Tesoro Refining and Marketing Company et al*,
13 C.D. Cal. Case No. 2:10-cv-05870.

14 7. I have been approved as class counsel in a number of class actions by the Superior
15 Courts of California and United States District Courts, including: *Antonio Becerra-Mata v. PSC*
16 *Industrial Outsourcing, LP*, San Benito County Superior Court Case No. CU-15-00030; *Eric*
17 *Chavez v. Converse, Inc.*, N.D. Cal. Case No. 15-cv-03746-NC and *Kosal So v. Owens-*
18 *Brockway Glass Container, Inc.*, Los Angeles County Superior Court Case No. BC608609.

19 8. I also second chaired two jury trials where I represented the prevailing defendant.
20 Both cases involved employees who brought claims against their former employers pursuant to
21 the Fair Employment & Housing Act. The cases are: *Jeff Cowell v. Eaton Aerospace LLC et al*,
22 Los Angeles County Superior Court Case No. BC401543; and *Richard Gulden v. Pratt &*
23 *Whitney Rocketdyne Inc. et al.*, Los Angeles County Superior Court Case No. BC468909.

24 9. To date, I have incurred approximately 20.7 hours in connection with the
25 litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have
26 incurred to date.

27 10. The total lodestar for my hours will be approximately \$14,490.00 based on an
28 hourly rate of \$700.00 per hour. Since at least 2017, I have been approved at an hourly rate of

1 \$650.00 per hour by various Courts, in a number of matters, including: *Antonio Becerra-Mata v.*
2 *PSC Industrial Outsourcing, LP*, San Benito County Superior Court Case No. CU-15-00030;
3 *Kosal So v. Owens-Brockway Glass Container, Inc.*, Los Angeles County Superior Court Case
4 No. BC608609; *Sarah Rodriguez v. Manpower, Inc.*, Santa Clara County Superior Court Case
5 No. 1-16-CV-294904; *Shannon Sanchez v. American Para Professional Systems, Inc.*, Santa
6 Clara County Superior Court Case No. 17CV306751. More recently, I have been approved at an
7 hourly rate of \$700.00 per hour by the following courts: *Foaad Hanna v. Equinix, LLC*, Santa
8 Clara County Superior Court Case No. 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los
9 Angeles County Superior Court Case No. BC720144; *Mary Della Maggiora v. Watsonville*
10 *Community Hospital*, Santa Cruz Superior Court Case No. 18CV00191; and *Michael Randolph*
11 *v. Pacific Racing Association*, Alameda County Superior Court Case No. RG18908139.

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

14 Executed on May 10, 2023, at Los Angeles, California.

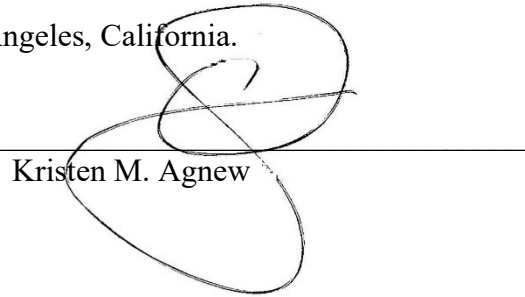
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Kristen M. Agnew

EXHIBIT A

JACKSON V. SAMUEL, SON & CO. (USA) INC.
Time and Task Chart for Kristen M. Agnew

Hours	Description of Work
5.8	Review case documents and perform research on viability of claims.
1.6	Review complaint and FAC.
3.9	Review and edit long form settlement agreement.
4.7	Review and edit Motion for Preliminary Approval and supporting documents.
3.0	Review and edit supplemental Motion for Preliminary Approval papers.
1.7	Review and edit Motion for Final Approval.
Total: 20.7	