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Attorneys for Plaintiffs, on a representative basis and on behalf of all others similarly situated

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

JODIE BLANTON JR., YAZMIN
CORTES, and GABRIELA ESCRIBA,
individually, on a representative basis, and
on behalf of all others similarly situated;

Plaintiffs,

vs.

COMMUNICATIONS TEST DESIGN,
INC., a Pennsylvania Corporation; and
DOES 1 through 20, inclusive;

Defendants.

Case No.: STK-CV-VOE-2021-5136

[Assigned to Hon. Judge Robert T. Waters, Dept.
11B, for all purposes]

**DECLARATION OF KRISTEN M. AGNEW IN
SUPPORT OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: August 23, 2023

Time: 9:00 A.M.

Dept.: 11B

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I, Kristen M. Agnew, 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 Diversity Law Group, P.C., counsel of record for Plaintiff Jodie Blanton Jr. ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. The Class and Representative Action Settlement Agreement and Release of Claims (“Settlement Agreement” or “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.

3. The settlement in the case at bar warrants approval and carries a presumption of fairness. As previously noted in the application for Preliminary Approval, this current settlement was negotiated at arm's length. I support the settlement as fair, reasonable, and adequate, and in the best interest of the Class Members as a whole.

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

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

6. 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 then senior associate, in the labor and employment practice group of Seyfarth Shaw, LLP from June 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

1 government agencies, including the California Department of Labor. My practice included the
2 defense of single plaintiff and multi-plaintiff lawsuits involving claims under the California Fair
3 Employment and Housing Act, the California Labor Code and the Fair Labor Standards Act. I
4 also handled a number of wage and hour class actions.

5 7. In June 2016, I joined Diversity Law Group, P.C. where I spend most of my time
6 handling employment cases. I primarily represent employees.

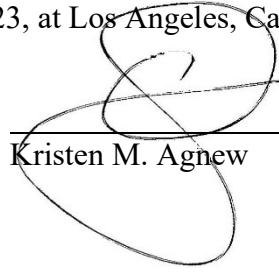
7 8. I served as the lead associate on a number of wage and hour class actions,
8 including *Martha Cardenas v. Gold's Gym*, Los Angeles County Superior Court Case No.
9 BC445112; *Nathaniel Werner v. Crown Equipment Corporation*, Los Angeles County Superior
10 Court Case No. BC439428; *Christopher Williams v. Allstate Insurance Co.*, Los Angeles County
11 Superior Court Case No. BC382577; *Hwang v. Caltech*, Los Angeles County Superior Court
12 Case No. BC464894; *Melissa Roberts v. Zale Delaware, Inc.*, Los Angeles Superior Court Case
13 No. BC523610; *Michael Oliver v. Konica Minolta Business Solutions U.S.A., Inc.*, Santa Clara
14 County Superior Court Case No. 114-CV-263183; *Tessa Hodge v. Zale Delaware, Inc., d/b/a*
15 *Piercing Pagoda*, San Bernardino Superior Court Case No CIVVS1301632; *Warren v. Paychex,*
16 *Inc.*, N.D. Cal. Case No. 3:10-cv-02006; *Tapia v. Zale Delaware Inc. et al*, S.D. Cal. Case No.
17 3:13-cv-01565; and *Benjamin Burgess et al v. Tesoro Refining and Marketing Company et al*,
18 C.D. Cal. Case No. 2:10-cv-05870.

19 9. I have been approved as class counsel in a number of class actions by the Superior
20 Courts of California and United States District Courts, including: *Antonio Becerra-Mata v. PSC*
21 *Industrial Outsourcing, LP*, San Benito County Superior Court Case No. CU-15-00030; *Andrew*
22 *Vasquez v. Earthbound Farm, LLC*, San Benito County Superior Court Case No. CU-17-00171;
23 *Fransisco Pulido v. Westrock Services, Inc.*, San Benito County Superior Court Case No. CU-18-
24 00074; *Kosal So v. Owens-Brockway Glass Container, Inc.*, Los Angeles County Superior Court
25 Case No. BC608609; *John Obiols v. Lockheed Martin Corporation*, Santa Clara County Superior
26 Court Case No. 17CV314178; *Eric Chavez v. Converse, Inc.*, N.D. Cal. Case No. 15-cv-03746-
27 NC.; *Sarah Rodriguez v. Manpower, Inc.*, Santa Clara County Superior Court Case No. 1-16-
28 CV-294904; *Shannon Sanchez v. American Para Professional Systems, Inc.*, Santa Clara County

1 Superior Court Case No. 17CV306751; *Foaad Hanna v. Equinix, LLC*, Santa Clara County
2 Superior Court Case No. 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles County
3 Superior Court Case No. BC720144; *Mary Della Maggiora v. Watsonville Community Hospital*,
4 Santa Cruz Superior Court Case No. 18CV00191; *Michael Randolph v. Pacific Racing*
5 *Association*, Alameda County Superior Court Case No. RG18908139; *Lao v. H&M Hennes &*
6 *Mauritz*, N.D. Cal. Case No. 16-cv-00333-EJD; and *Chavez v. Converse*, Case Number N.D.
7 Cal. Case No. 5:16-cv-333 EJD.

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

10 Executed on this 17th day of July 2023, at Los Angeles, California.

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14 Kristen M. Agnew
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