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Attorneys for Plaintiff and Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

LORELEI CHAMBERS, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

vs.

SOMACIS INC., a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 37-2021-00033445-CU-OE-CTL

(Assigned to Hon. Eddie C. Sturgeon, Dept. C-67)

**DECLARATION OF KRISTEN M. AGNEW IN
SUPPORT OF PLAINTIFF'S MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: November 18, 2022

Time: 9:00 a.m.

Dept.: C-67

Complaint Filed: August 5, 2021

Trial Date: None Set

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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 Lorelei Chambers (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. From the inception of the case, Plaintiff's Counsel have zealously represented the interests of Plaintiff and the PAGA Settlement Group Members.

3. I strongly believe that Plaintiff can prevail at trial. However, I also believe in the fairness of the settlement. After taking into account sharply disputed factual and legal issues involved in this litigation, the risks attending further prosecution, and the substantial benefits to be received pursuant to the compromise and settlement of the litigation, I have concluded that settlement on the terms set forth in the Settlement Agreement is appropriate and in the best interests of Plaintiff and the PAGA Settlement Group Members.

4. 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.

5. 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 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

1 Employment and Housing Act, the California Labor Code and the Fair Labor Standards Act. I
2 also handled a number of wage and hour class actions.

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

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

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

22 9. I have been approved as class counsel in numerous wage/hour class actions that
23 have been granted class certification and final approval, including: *Antonio Becerra-Mata v. PSC*
24 *Industrial Outsourcing, LP*, San Benito County Superior Court Case No. CU-15-00030; *Kosal*
25 *So v. Owens-Brockway Glass Container, Inc.*, Los Angeles County Superior Court Case No.
26 BC608609; *Sarah Rodriguez v. Manpower, Inc.*, Santa Clara County Superior Court Case No. 1-
27 16-CV-294904; *Shannon Sanchez v. American Para Professional Systems, Inc.*, Santa Clara
28 County Superior Court Case No. 17CV306751; *Foad Hanna v. Equinix, LLC*, Santa Clara

1 County Superior Court Case No. 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles
2 County Superior Court Case No. BC720144; *Mary Della Maggiora v. Watsonville Community*
3 *Hospital*, Santa Cruz Superior Court Case No. 18CV00191; *Michael Randolph v. Pacific Racing*
4 *Association*, Alameda County Superior Court Case No. RG18908139; *Cody Wirbick v. Sundt*
5 *Construction, Inc.*, U.S. District Court for the Eastern District of California Case No. 2:19-cv-
6 02067-MCE-CKD; *Jose Vasquez Ruiz v. Perdue Foods, LLC*, Sonoma County Superior Court
7 Case No. SCV 264649; *Delmer Wood III v. Reeve Trucking Company Inc.*, San Joaquin
8 Superior Court Case No. STK-CV-UOE-2018-0004414; *Eric Chavez v. Converse, Inc.*, U.S.
9 District Court for the Northern District of California Case No. 15-cv-03746-NC; *Jharett Siron v.*
10 *Raypak, Inc.*, Ventura County Superior Court Case No. 56-2019-00527959-CU-OE-VTA;
11 *Prexxie Pascual and Arturo Fonseca v. Satellite Healthcare, Inc.*, Santa Clara Superior Court
12 Case No. 19CV345211; and *Markham v. Quik Stop Markets, Inc.*, Santa Clara Superior Court
13 Case No. 19CV341582.

14 10. To date, I have incurred approximately 17.2 hours in connection with the
15 litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have spent on
16 this case to date.

17 11. The total lodestar for my hours will be approximately \$12,040 based on an hourly
18 rate of \$700.00 per hour (17.2 hours x 700). I have been approved at an hourly rate of \$700.00
19 per hour by various Courts, including: *Foaad Hanna v. Equinix, LLC*, Santa Clara County
20 Superior Court Case No. 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles County
21 Superior Court Case No. BC720144; *Mary Della Maggiora v. Watsonville Community Hospital*,
22 Santa Cruz Superior Court Case No. 18CV00191; *Michael Randolph v. Pacific Racing*
23 *Association*, Alameda County Superior Court Case No. RG18908139; *Prexxie Pascual and*
24 *Arturo Fonseca v. Satellite Healthcare, Inc.*, Santa Clara Superior Court Case No. 19CV345211;
25 *Chavez v. Converse, Inc.*, United States District Court, Northern District of California Case No.
26 15-cv-03746-NC; and *Carrillo v. New Balance Athletics, Inc.*, Santa Clara Superior Court Case
27 No. 19CV352469.

28 I declare under penalty of perjury under the laws of the State of California that the

1 foregoing is true and correct.

2 Executed on this 17th day of May 2022, at Los Angeles, California.

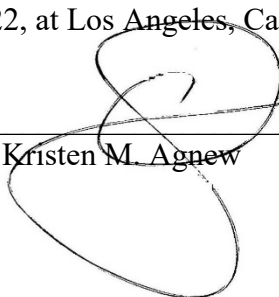
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EXHIBIT A

Chambers v. Somacis Inc.
Time and Task Chart for Kristen Agnew

Hours	Description of Work
.8	Review and edit Complaint.
2.1	Review and edit mediation brief.
7.3	Attend mediation.
3.1	Review and edit settlement agreement.
3.9	Review and edit approval motion.
17.2	TOTAL HOURS