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Attorneys for Plaintiff and the Class

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

ANTONIO JESUS JARAMILLO DE LA CRUZ,
as an individual and on behalf of all others
similarly situated, and as a private attorney
general,

Plaintiff,

vs.

WEIDNER PROPERTY MANAGEMENT, LLC,
a Washington limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 34-2021-00308697

[Assigned for all purposes to Department 28,
Hon. Lauri A. Damrell]

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

Date: August 4, 2023
Time: 9:00 a.m.
Department: 25

Complaint Filed: September 22, 2021
FAC Filed: February 28, 2022

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 & Egbert Employment Law, P.C., counsel of record for Plaintiff. I have
4 personal knowledge of the facts set forth below and if called to testify I could and would do so
5 competently.

6 1. I am one of the primary attorneys on this matter. My qualifications are as follows:

7 2. I graduated from Georgetown University Law Center in 2014 and was admitted to the
8 California Bar in 2015.

9 3. From about June 2015 to about June 2017, I was an attorney at the Velez Law Firm where
10 I represented numerous plaintiffs in employment lawsuits. During this time, Mr. Velez and I obtained a
11 jury verdict, in a single plaintiff, age discrimination case, in the amount of \$4,750,000.00 (*Barbara*
12 *Anderton v. Bass Underwriters*, Sacramento County Superior Court, Case No. 34-2013-00149236).

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

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

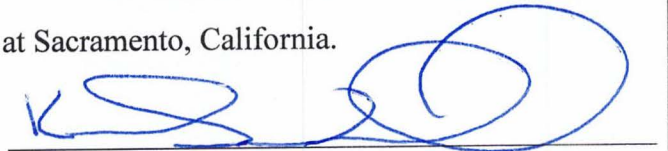
21 6. In March 2020, I founded Webber & Egbert Employment Law, P.C. At Webber & Egbert,
22 I spend most of my time litigating employment-related lawsuits, representing California employees.

23 7. Currently, my office represents plaintiffs in a number of class actions, including but not
24 limited to: *Michael Gibson v. Southwest Traders Incorporated* (San Joaquin County Superior Court, Case
25 No. STK-CV-UOE-2020-0010620); *Derek Austin v. BQ Express Inc.* (Sacramento County Superior Court,
26 Case No. 34-2021-00297271); *Wendie Brandt v. Kids Care Dental & Orthodontics* (Sacramento County
27 Superior Court, Case No. 34-2021-00296816); *Paul Gullett v. Apple American Group, LLC* (Placer
28 County Superior Court, Case No. S-CV-0045844); *Vincent Ramsey Jr. v. Packaging Corporation of*
America (Sacramento County Superior Court, Case No. 34-2021-00313350); *Gerardo Negrete v. Ace*

1 *Hardware Corporation* (Placer County Superior Court, Case No. S-CV-0047322); *Stephanie Karabinus*
2 *v. Circle Pizza, LLC* (Placer County Superior Court, Case No. S-CV-0048669).

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

7 I declare under penalty of perjury under the laws of the State of California that the foregoing is
8 true and correct. Executed this 7th day of July 2023, at Sacramento, California.

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10 Kelsey A. Webber
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