

Edwin Aiwazian (SBN 232943)
Joanna Ghosh (SBN 272479)
Matthew Richard Soto (SBN 353499)
LAWYERS for JUSTICE, PC
410 West Arden Avenue, Suite 203
Glendale, California 91203
Tel: (818) 265-1020 / Fax: (818) 265-1021

Attorneys for Plaintiff Andrea Rodriguez

[Additional Counsel on the Next Page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

ANDREA RODRIGUEZ, individually, and
on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act; RAJVEER KAUR, individually, and
on behalf of other aggrieved employees pursuant to
the California Private Attorneys General Act;
Plaintiff,

vs.

KAN DI KI, LLC, a California limited
liability company; and DOES 1 through 100,
inclusive,
Defendants.

Case No.: 21BBCV004466

Honorable Jared D. Moses
Department P

**DECLARATION OF SHAELYN A.
STEWART IN SUPPORT OF PLAINTIFFS'
NOTICE OF MOTION AND MOTION FOR
APPROVAL OF PRIVATE ATTORNEYS
GENERAL ACT (CAL. LABOR CODE §
2698, *ET SEQ.*) SETTLEMENT
AGREEMENT AND AWARD OF
ATTORNEYS' FEES AND COSTS,
GENERAL RELEASE FEE, AND
SETTLEMENT ADMINISTRATION
COSTS**

Reservation ID: 115837372268
Date: April 1, 2025
Time: 8:30 a.m.
Department: P

Complaint Filed: May 6, 2021
FAC Filed: December 13, 2024
Trial Date: None Set

**DECLARATION OF SHAELYN A. STEWART IN SUPPORT OF PLAINTIFFS' MOTION FOR APPROVAL
OF PRIVATE ATTORNEYS GENERAL ACT SETTLEMENT AGREEMENT AND RELEASE, AWARD OF
ATTORNEYS' FEES AND COSTS, GENERAL RELEASE FEE, AND SETTLEMENT ADMINISTRATION
COSTS**

Larry W. Lee (SBN 228175)
Kristen M. Agnew (SBN 247656)
Nicholas Rosenthal (SBN 268297)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, California 90071
Tel: (213) 488-6555 / Fax: (213) 488-6554

Kelsey A. Webber (SBN 303721)
Shaelyn A. Stewart (SBN 335149)
WEBBER & EGBERT EMPLOYMENT LAW, P.C.
1610 R Street, Suite 300
Sacramento, CA 95811
Telephone: (916) 588-0683

Attorneys for Plaintiff Rajveer Kaur

DECLARATION OF SHAELYN A. STEWART

I, Shaelyn A. Stewart, hereby declare as follows:

1. I am an attorney admitted to practice in the State of California and, with the law firm WEBBER & EGBERT EMPLOYMENT LAW, P.C., am counsel of record for Plaintiffs Andrea Rodriguez and Rajveer Kaur ("Plaintiffs") in the above-entitled action. I have personal knowledge of the matters set forth herein, and if called upon as a witness to testify thereto, I could and would competently do so.

2. I am one of the attorneys on this matter. My qualifications are as follows: I graduated from McGeorge School of Law in 2020. Prior to joining Webber & Egbert Employment Law, P.C., I served as a Judicial Extern in the U.S. District Court for the Eastern District of California. I spend most of my time litigating employment-related lawsuits, representing California employees.

3. Currently, my office represents plaintiffs in a number of class actions, including but not limited to: *Derek Austin v. BQ Express Inc.* (Sacramento County Superior Court, Case No. 34-2021-00297271); *Billy Ford v. The Silver F, Inc.* (Sacramento County Superior Court, Case No. 34-2021-00313161); *Gerardo Negrete v. Ace Hardware Corporation* (Placer County Superior Court, Case No. S-CV-0047322); *Thalia Maravilla v. LCS Community Employment LLC* (Sonoma County Superior Court, Case No. SCV-270452).

4. I have been approved as class counsel in numerous other wage/hour class actions.

5. Based on my independent investigation and evaluation, I am of the opinion that the proposed settlement is fair, reasonable, and adequate, and is in the best interests of the Aggrieved Employees and the State of California, in light of all known facts and circumstances, and the expenses and risks inherent in litigation. The settlement was negotiated at arm's length and was facilitated by an experienced and neutral mediator. Thus, this settlement should be granted approval.

6. Webber & Egbert Employment Law, P.C. has incurred costs in the amount of \$73.80 for a Court filing. Attached hereto as **Exhibit A** is a copy of the costs Webber & Egbert Employment Law, P.C. has incurred in connection with the prosecution of this lawsuit.

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

3 Executed this 24th day of January 2025, at Brooklyn, New York.

4
5 Shaelyn Stewart
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A



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

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

Credit Card Sale

Date	8/1/2023
Customer	0144453
Credit Sale	05193990
Amount Due	\$0.00

One Legal Order Number	20695892
Contact	Kelsey Webber
Attorney Name	Kelsey Webber
Case Title	Rajveer Kaur
Case Number	34-2021-00306024
Court	Superior Court of California, Sacramento County
Documents	Notice of Change of Firm Name

ONE LEGAL FEES	AMOUNT
Court Filing Service Charge, 1 - 15 Pages	\$70.00
eServe Charge	\$1.00
Convenience Fee†	\$2.80
SUBTOTAL	\$73.80

FEES SUMMARY	AMOUNT
One Legal Fees	\$73.80
TOTAL CHARGED	\$73.80

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.