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

AMY OROZCO, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

BETTS COMPANY, a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 34-2021-00309846

(Assigned to the Hon. Lauri A. Damrell, Dept. 28)

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

Date: May 5, 2023

Time: 9:00 a.m.

Dept.: 28

Reservation No.: 2713039

Complaint Filed: October 15, 2021

FAC Filed: December 27, 2021

SAC Filed: March 9, 2022

Trial Date: Not Set

DECLARATION OF KELSEY A. WEBBER

I, Kelsey A. Webber, declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am the owner of the Webber Law Group, P.C., counsel of record for Plaintiff Amy Orozco ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

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

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

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

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

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

7. In March 2020, I founded the Webber Law Group, P.C. At the Webber Law Group, I spend most of my time litigating employment related lawsuits, representing California employees.

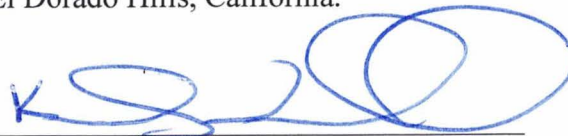
8. Currently, my office represents plaintiffs in a number of class actions, including but not limited to: *Michael Gibson v. Southwest Traders Incorporated* (San Joaquin County Superior Court, Case No. STK-CV-UOE-2020-0010620); *Derek Austin v. BQ Express Inc.*

(Sacramento County Superior Court, Case No. 34-2021-00297271); *Wendie Brandt v. Kids Care Dental & Orthodontics* (Sacramento County Superior Court, Case No. 34-2021-00296816); *Paul Gullett v. Apple American Group, LLC* (Placer County Superior Court, Case No. S-CV-0045844); *Antonio Jesus Jaramillo De La Cruz v. Weidner Property Management, LLC* (Sacramento County Superior Court, Case No. 34-2021-00308697); *Gerardo Negrete v. Ace Hardware Corporation* (Placer County Superior Court, Case No. S-CV-0047322); *Stephanie Karabinus v. Circle Pizza, LLC* (Placer County Superior Court, Case No. S-CV-0048669).

9. Based on my independent investigation and evaluation, I am of the opinion that settlement for the consideration and on the terms set forth in the Joint Stipulation of Class Action and PAGA Settlement and Release (“Stipulation” or “Settlement Agreement”) is fair, reasonable, and adequate and is in the best interests of the Class, in light of all known facts and circumstances and the expenses and risks inherent in litigation.

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

Executed on this April 12, 2023, at El Dorado Hills, California.



Kelsey A. Webber