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Attorneys for Plaintiff,
HEA YON SUZZIE DORN, on behalf of herself and all other similarly situated employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF MONTEREY

HEA YON SUZZIE DORN, on behalf of
herself and all similarly aggrieved
employees,

Plaintiff,

v.

CENTRAL COAST FEDERAL CREDIT
UNION; and DOES 1 through 50, inclusive,

Defendants.

Case No. 22CV000335

(Assigned to the Honorable Thomas W. Wills,
Dept. 15)

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

Date: March 8, 2024
Time: 8:30 a.m.
Dept.: 15

Complaint Filed: February 3, 2022
Trial Date: Not Set

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1 19CV352469.

2 6. If the Court would prefer to apply a rate of \$550.00 per hour, my lodestar is
3 \$12,980.

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

10 8. Since 2009, my primary area of practice has been employment litigation. I have
11 practiced law at two preeminent employment defense firms. From May 2009 to June 2011, I
12 was an associate at Ogletree, Deakins, Nash, Smoak & Stewart, P.C. I was also an associate,
13 and then senior associate, in the labor and employment practice group of Seyfarth Shaw, LLP
14 from June 2011 to May 2016. At both Ogletree and Seyfarth, I represented a wide array of
15 fortune 500 companies in employment litigation in both state and federal courts, as well as
16 before government agencies, including the California Department of Labor. My practice
17 included the defense of single plaintiff and multi-plaintiff lawsuits involving claims under the
18 California Fair Employment and Housing Act, the California Labor Code and the Fair Labor
19 Standards Act. I also handled a number of wage and hour class actions.

20 9. 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 10. I served as the lead associate on a number of wage and hour class actions,
23 including *Martha Cardenas v. Gold's Gym*, Los Angeles County Superior Court Case No.
24 BC445112; *Nathaniel Werner v. Crown Equipment Corporation*, Los Angeles County
25 Superior Court Case No. BC439428; *Christopher Williams v. Allstate Insurance Co.*, Los
26 Angeles County Superior Court Case No. BC382577; *Hwang v. Caltech*, Los Angeles County
27 Superior Court Case No. BC464894; *Melissa Roberts v. Zale Delaware, Inc.*, Los Angeles
28 Superior Court Case No. BC523610; *Michael Oliver v. Konica Minolta Business Solutions*

1 *U.S.A., Inc.*, Santa Clara County Superior Court Case No. 114-CV-263183; *Tessa Hodge v.*
2 *Zale Delaware, Inc., d/b/a Piercing Pagoda*, San Bernardino Superior Court Case No
3 CIVVS1301632; *Warren v. Paychex, Inc.*, N.D. Cal. Case No. 3:10-cv-02006; *Tapia v. Zale*
4 *Delaware Inc. et al*, S.D. Cal. Case No. 3:13-cv-01565; and *Benjamin Burgess et al v. Tesoro*
5 *Refining and Marketing Company et al*, C.D. Cal. Case No. 2:10-cv-05870.

6 11. I have been approved as class counsel in a number of class actions by the
7 Superior Courts of California and United States District Courts, including: *Antonio Becerra-*
8 *Mata v. PSC Industrial Outsourcing, LP*, San Benito County Superior Court Case No. CU-15-
9 00030; *Eric Chavez v. Converse, Inc.*, N.D. Cal. Case No. 15-cv-03746-NC and *Kosal So v.*
10 *Owens-Brockway Glass Container, Inc.*, Los Angeles County Superior Court Case No.
11 BC608609.

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

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

20 Executed on this 14th of February 2024, at Los Angeles, California.

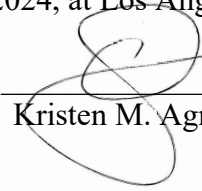
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23 _____
24 Kristen M. Agnew
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EXHIBIT A

Dorn v. Central Coast Federal Credit Union
Kristen M. Agnew Time and Task Chart

Hours	Description of Work
3.0	Review and edit mediation brief.
8.3	Attend mediation.
1.7	Review and edit long-form settlement agreement.
2.7	Review and edit Motion for Preliminary Approval and supporting papers.
7.9	Review and edit Motion for Final Approval and supporting papers.
23.6	TOTAL HOURS