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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 PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: June 30, 2023
Time: 9:00 a.m.
Dept.: 15

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

1 Angeles County Superior Court Case No. BC382577; *Hwang v. Caltech*, Los Angeles County
2 Superior Court Case No. BC464894; *Melissa Roberts v. Zale Delaware, Inc.*, Los Angeles
3 Superior Court Case No. BC523610; *Michael Oliver v. Konica Minolta Business Solutions*
4 *U.S.A., Inc.*, Santa Clara County Superior Court Case No. 114-CV-263183; *Tessa Hodge v.*
5 *Zale Delaware, Inc., d/b/a Piercing Pagoda*, San Bernardino Superior Court Case No
6 CIVVS1301632; *Warren v. Paychex, Inc.*, N.D. Cal. Case No. 3:10-cv-02006; *Tapia v. Zale*
7 *Delaware Inc. et al*, S.D. Cal. Case No. 3:13-cv-01565; and *Benjamin Burgess et al v. Tesoro*
8 *Refining and Marketing Company et al*, C.D. Cal. Case No. 2:10-cv-05870.

9 6. I have been approved as class counsel in a number of class actions by the
10 Superior Courts of California and United States District Courts, including: *Antonio Becerra-*
11 *Mata v. PSC Industrial Outsourcing, LP*, San Benito County Superior Court Case No. CU-15-
12 00030; *Eric Chavez v. Converse, Inc.*, N.D. Cal. Case No. 15-cv-03746-NC and *Kosal So v.*
13 *Owens-Brockway Glass Container, Inc.*, Los Angeles County Superior Court Case No.
14 BC608609.

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

21 8. Each side has apprised the other of their respective factual contentions, legal
22 theories, and defenses, resulting in extensive arm's length negotiations taking place among the
23 Parties. Based on their own independent investigation and evaluation, the Parties and their
24 respective counsel are of the opinion that the settlement for the consideration and on the terms
25 set forth in the Joint Stipulation and Settlement of Class Action Claims is fair, reasonable, and
26 adequate and the settlement is in the best interests of the Class and Defendant in light of all
27 known circumstances and the expenses and risks inherent in litigation.

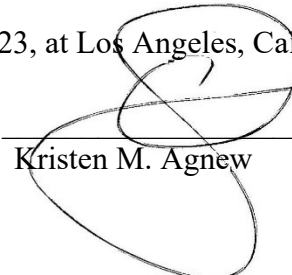
28 9. Plaintiff also believes in the fairness of the settlement that is based on factoring

1 in the uncertainty and risks to Plaintiff involved in not prevailing on her class claims at trial
2 and the possibility of appeals.

3 10. Plaintiff and Plaintiff's counsel are adequate representatives in that they have no
4 conflicts with the Class and will adequately represent the Class.

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

7 Executed on this 7th day of June 2023, at Los Angeles, California.

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