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Attorneys for Plaintiff, on a representative basis and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

BRETT CONSTANT, individually, on a
representative basis, and on behalf of all others
similarly situated;

Plaintiff,

vs.

ROOTER RANGER, LLC, an Arizona Limited
Liability Company; BEEBE ENTERPRISES,
INC., a California Corporation; and DOES 1
through 20, inclusive;

Defendants.

Case No.: CIVSB 2206149

*[Assigned to Hon. Judge David Cohn, Dept S26,
for all purposes]*

**DECLARATION OF KRISTINA BUI
CARLSON, ESQ., IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Complaint filed: March 21, 2022

I, Kristina Bui Carlson, state and declare:

1. I am an attorney duly licensed to practice law in the State of California and am
an Associate at Lauby, Mankin & Lauby LLP, attorneys for Plaintiff in the above-entitled
action. I am fully familiar with the facts of this case. The matters set forth herein are based
upon my personal knowledge. I submit this declaration in support of Plaintiff's Motion for
Preliminary Approval of this Class Action Settlement and, if called upon as a witness, I could
and would give competent testimony with respect to the matters contained herein.

2. For the sake of brevity, this declaration does not discuss the settlement itself, the
procedural background of the litigation, the claims and investigation by my firm and co-

1 counsel, and why the settlement is fair and reasonable. Those topics are covered in detail in
2 the concurrently filed Declaration of Brian Mankin. This declaration simply provides
3 information requested by the court as to why I am adequate class counsel.

4 **QUALIFICATION OF COUNSEL**

5 3. I graduated from the University of Oregon School of Law in May 2013 and
6 have been a member, in good standing, of the State Bar of California since December 2013. I
7 am licensed to practice before all courts of the State of California and am admitted to practice
8 in the United States District Court for the Central District of California and have litigated cases
9 in various courts and counties throughout California, including the Court of Appeal.

10 4. I began working at Fernandez & Lauby LLP (the predecessor of Lauby, Mankin
11 & Lauby LLP) in September 2015 and, my current practice consists solely of representing
12 employees. All of my current cases have been litigated as class actions, representative PAGA
13 actions, or a combination of the two.

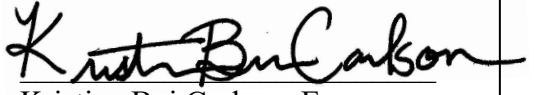
14 5. I have been the handling attorney on nearly two dozen class action and/or
15 representative PAGA actions. And, on these cases, myself and/or my firm have been
16 appointed Class Counsel and have helped negotiate settlements totaling millions of dollars for
17 our clients, the employees, and the State of California.

18 **CONCLUSION**

19 6. As set forth above, I have litigated nearly two dozen class and representative
20 actions, and have successfully resolved many of those cases, with many others still pending
21 that will resolve in the future.

22 7. For these reasons, as well as the facts and information presented in the
23 concurrently filed Declaration of Brian J. Mankin, it is respectfully requested that the Court:
24 (1) grant preliminary approval of the settlement as being fair, reasonable, and in the best
25 interests of the class, (2) appoint Plaintiff as the Class Representative, (3) appoint Brian J.
26 Mankin and Kristina Bui Carlson of Lauby, Mankin & Lauby LLP, as Class Counsel, and (4)
27 preliminarily approve the requested attorneys' fees, costs, and enhancement payment to the
28 Class Representative.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct. Executed on January 25, 2023 at Riverside, California.

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4 By: 
5 Kristina Bui Carlson, Esq.
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