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Attorneys for Plaintiff and the Class

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

THALIA MARAVILLA, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

LCS COMMUNITY EMPLOYMENT
LLC, an Iowa limited liability company;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: SCV-270452

**DECLARATION OF SHAELYN A.
STEWART IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF
CLASS AND REPRESENTATIVE ACTION
SETTLEMENT**

Date: March 12, 2025

Time: 3:00 p.m.

Dept.: 17

Complaint Filed: March 23, 2022

Trial Date: None

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

2 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
3 California, and am with the law firm Webber & Egbert Employment Law, P.C., counsel of record
4 for Plaintiff Thalia Maravilla (“Class Representative” or “Plaintiff”). I have personal knowledge
5 of the facts set forth below and if called to testify I could and would do so competently.

6 2. I am one of the attorneys on this matter. As detailed in the motion for preliminary
7 approval, the Joint Stipulation of Class and Representative Action Settlement (“Agreement” or
8 “Settlement Agreement”) was the product of negotiation between highly able and experienced
9 attorneys on both sides who possessed the relevant data and extensive legal research which they
10 had carefully analyzed. Plaintiff’s counsel engaged in extensive factual investigation before
11 settling, including propounding formal discovery, and reviewing data and other information
12 relevant to valuing this case. I support the settlement as fair, reasonable, and adequate, and in the
13 best interest of class members.

14 3. The funds represented by uncashed settlement checks will be paid out pursuant to
15 California Code of Civil Procedure section 384 to Legal Aid at Work, the designated *cy pres*
16 recipient. I do not maintain an interest in and/or relationship with Legal Aid at Work.

17 4. I have been approved as class counsel in numerous other wage/hour class actions
18 that have been granted class certification and final approval, and have been approved as counsel
19 in both class and representative actions under the PAGA.

20 5. My qualifications are as follows: I graduated from McGeorge School of Law in
21 2020. Prior to joining Webber & Egbert Employment Law, P.C., I served as a Judicial Extern in
22 the U.S. District Court for the Eastern District of California. I spend most of my time litigating
23 employment-related lawsuits, representing California employees.

24 6. Currently, my office represents plaintiffs in a number of class actions, including
25 but not limited to: *Derek Austin v. BQ Express Inc.* (Sacramento County Superior Court, Case No.
26 28 34-2021-00297271); *Paul Gullett v. Apple American Group, LLC* (Placer County Superior
27 Court Case No. S-CV-0045844); *Gerardo Negrete v. Ace Hardware Corporation* (Placer County
28 Superior Court, Case No. S-CV-0047322); *Rajveer Kaur v. Tridentcare* (Sacramento County

Superior Court, Case No. 34-2021-00306024).

7. Below is a summary of the hours I have expended in litigating this case to date:

Name	Position	Hours	Rate	Lodestar
Shaelyn Stewart	Senior Associate	3.5	\$600	\$2,100
TOTAL				\$2,100

8. The hours I have spent litigating this case to date include time spent in: conversations with Plaintiff to discuss the facts of the case; conferences with co-counsel regarding the same; conversations with Plaintiff and co-counsel regarding mediation; and the drafting and review of settlement documents, including my declarations in support of preliminary and final approval. I believe my hourly rate is justified in light of my experience, and the results I have achieved in the past and in this case.

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

Executed on this 14th day of February 2025, at Brooklyn, New York.

Shaelyn Stewart
Shaelyn A. Stewart