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Attorneys for Plaintiff and Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

MATTHEW ONG, as an individual and on
behalf of aggrieved employees,

Plaintiff,

vs.

EHEALTHINSURANCE SERVICES,
INC., a Delaware corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 22CV399893

[Assigned for all purposes to the Hon. Charles F.
Adams, Dept. 7]

**DECLARATION OF KELSEY A. WEBBER IN
SUPPORT OF PLAINTIFF'S MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: June 6, 2024

Time: 1:30 P.M.

Dept.: 7

Complaint Filed: July 5, 2022

Trial Date: None

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 Webber & Egbert Employment Law, P.C. (formerly Webber Law Group, P.C.), counsel of record for Plaintiff Matthew Ong ("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 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 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 (now Webber & Egbert Employment Law, P.C.). At Webber & Egbert Employment Law, I spend most of my time litigating employment related lawsuits, representing California employees.

8. Currently, my office represents plaintiffs in a number of class and PAGA matters, 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); *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. I have received numerous awards, including being named to the Top 40 Under 40 by the National Trial Lawyers Association in 2020, 2021, 2022, and 2023.

10. Based on my investigation and evaluation, I am of the opinion that settlement for the consideration and on the terms set forth in the Settlement Agreement is fair, reasonable, and adequate and is in the best interests of the aggrieved employees, in light of all known facts and circumstances and the expenses and risks inherent in litigation.

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

Name	Position	Hours	Rate	Lodestar
Kelsey Webber	Shareholder	4.6	\$750.00	\$3,450.00
TOTAL				\$3,450.00

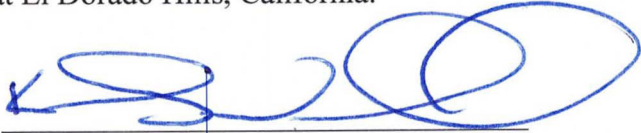
12. The hours I have spent litigating this case to date include time spent in: meetings with Plaintiff to discuss the facts and theories of the case, analysis and review of documents provided by Plaintiff to determine viable causes of action; conferences with co-counsel regarding the same; and the drafting and review of settlement documents, including this declaration. I believe my hourly rate is justified in light of the experience of our attorneys and staff and the excellent results we have achieved in the past, as detailed above, and in this case.

13. Plaintiff signed a written retainer agreement that governs my firm and my co-counsel's representation of him in this action. The written agreement expressly provides that the fees ultimately approved by the Court will be split between counsel. Pursuant to the written agreement, Diversity Law Group will receive two-thirds (2/3) of the legal fees recovered and Webber & Egbert Employment Law, P.C. (formerly Webber Law Group, P.C.) will receive one-

1 third (1/3) of the legal fees recovered. The written agreement advised Plaintiff that the agreement
2 to split legal fees would not increase the fees owed by Plaintiff for his representation.

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

5 Executed on this January 12, 2024, at El Dorado Hills, California.

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