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Attorneys for Defendant
THE PRUDENTIAL INSURANCE COMPANY OF
AMERICA (erroneously named and sued as
PRUDENTIAL INS CO OF AMERICA)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

SUSANA CALDERON, individually, on a
representative basis, and on behalf of all others
similarly situated;

Plaintiff,

v.

PRUDENTIAL INS CO OF AMERICA, a New
Jersey Corporation; and DOES 1 through 20,
inclusive;

Defendants.

Case No.: 22STCV13172

*Assigned for All Purposes to: Hon. Elihu M.
Berle, Dept. 6*

**DECLARATION OF DANIEL WHANG IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: September 6, 2023
Time: 9:000 a.m.
Dept: 6

Complaint Filed: April 20, 2022

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I, Daniel Whang, hereby declare:

1. I am an attorney admitted to practice law in the state of California and am a partner with the law firm of Seyfarth Shaw LLP, attorneys for Defendant The Prudential Insurance Company of America (erroneously named and sued as Prudential Ins Co of America) (“Defendant”). I make this declaration based on my personal knowledge, except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true. If called to do so, I could and would testify competently thereto.

2. I submit this Declaration in connection with Plaintiff Susana Calderon's Motion for Preliminary Approval of Class Action and PAGA Settlement, related to the settlement made between Plaintiff and Defendant in this matter ("Settlement"). This Settlement involves a lawsuit brought by Plaintiff against Defendant entitled *Susana Calderon v. Prudential Ins Co of America; and Does 1 through 20*, currently pending in Superior Court of Los Angeles. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

3. The parties have agreed to use Phoenix Class Action Administration Solutions as the neutral entity to administer the Settlement. I am not aware of any actual or potential conflicts of interest between my firm or Defendant with Phoenix Class Action Administration Solutions.

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

Executed this 3rd day August, 2023, in Los Angeles, California.

Daniel Whang