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Superior Court of California
County of Los Angeles

MAY 24 2017

Sherrin R. Carter, Executive Officer/Clerk

By [Signature], Deputy

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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, CENTRAL CIVIL WEST**

RAMON SINGLEY, as an individual and
on behalf of all others similarly situated,

Plaintiffs,

vs.

BLS LIMOUSINE SERVICE OF LOS
ANGELES, INC., a California corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: BC619822

(Assigned to the Honorable Kenneth R. Freeman,
Department 310)

**DECLARATION OF KRISTEN AGNEW IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: August 31, 2017
Time: 11:00 A.M.
Dept.: 310

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1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am with the law firm Diversity Law Group, P.C., counsel of record for Named Plaintiff Ramon Singley ("Plaintiff"). I have personal knowledge of the facts set forth below and I declare under penalty of perjury that I am competent to testify I could and would do so competently.

3. Both Plaintiff's and Defendant's counsel have a great deal of experience in wage and hour class action litigation. Plaintiff's counsel has been approved as class counsel in a number of wage and hour class actions and have extensive litigation experience.

5. Since 2009, my primary area of practice has been employment litigation. I have practiced law at two preeminent employment defense firms. From May 2009 to June 2011, I was an associate at Ogletree, Deakins, Nash, Smoak & Stewart, P.C. I was also an associate, and then senior associate, in the labor and employment practice group of Seyfarth Shaw, LLP from June 2011 to May 2016. At both Ogletree and Seyfarth, I represented a wide array of fortune 500 companies in employment litigation in both state and federal courts, as well as before government agencies, including the California Department of Labor. My practice included the defense of single plaintiff and multi-plaintiff lawsuits involving claims under the California Fair

1 Employment and Housing Act, the California Labor Code and the Fair Labor Standards Act. I
2 also handled a number of wage and hour class actions.

3 6. In June 2016, I joined Diversity Law Group, P.C. where I spend most of my time
4 handling employment cases. I primarily represent employees.

5 7. I served as the lead associate on a number of wage and hour class actions,
6 including *Martha Cardenas v. Gold's Gym*, Los Angeles County Superior Court Case No.
7 BC445112; *Nathaniel Werner v. Crown Equipment Corporation*, Los Angeles County Superior
8 Court Case No. BC439428; *Christopher Williams v. Allstate Insurance Co.*, Los Angeles County
9 Superior Court Case No. BC382577; *Hwang v. Caltech*, Los Angeles County Superior Court
10 Case No. BC464894; *Melissa Roberts v. Zale Delaware, Inc.*, Los Angeles Superior Court Case
11 No. BC523610; *Michael Oliver v. Konica Minolta Business Solutions U.S.A., Inc.*, Santa Clara
12 County Superior Court Case No. 114-CV-263183; *Tessa Hodge v. Zale Delaware, Inc., d/b/a*
13 *Piercing Pagoda*, San Bernardino Superior Court Case No CIVVS1301632; *Warren v. Paychex,*
14 *Inc.*, N.D. Cal. Case No. 3:10-cv-02006; *Tapia v. Zale Delaware Inc. et al*, S.D. Cal. Case No.
15 3:13-cv-01565; and *Benjamin Burgess et al v. Tesoro Refining and Marketing Company et al*,
16 C.D. Cal. Case No. 2:10-cv-05870.

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

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

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

3 Executed on this 24th day of May, 2017 at Los Angeles, California.

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6 Kristen Agnew
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PROOF OF SERVICE

(Code of Civil Procedure Sections 1013a, 2015.5)

STATE OF CALIFORNIA]
]ss.
COUNTY OF LOS ANGELES]

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 515 South Figueroa Street, Suite 1250, Los Angeles, California 90071.

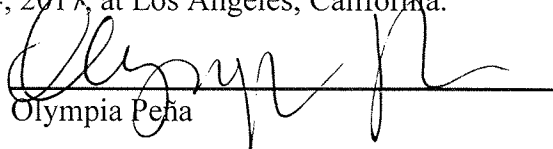
On May 24, 2017, I served the following document(s) described as: **DECLARATION OF KRISTEN AGNEW IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** on the interested parties in this action as follows:

John K. Skousen, Esq.
Christopher M. Ahearn, Esq.
Fisher & Phillips, LLP
2050 Main Street, Suite 1000
Irvine, California 92614

Attorney for Defendant BLS Limousine Service of Los Angeles, Inc.

 X BY ELECTRONIC SERVICE VIA CASE ANYWHERE: Based on a Court Order I caused the above-entitled document(s) to be served through Case Anywhere at the website www.caseanywhere.com, addressed to all parties appearing on the electronic service list for the above-entitled case. The service transmission was reported as complete and a copy of the Case Anywhere Filing Receipt/Confirmation will be filed, deposited, or maintained with the original document(s) in this office.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on May 24, 2017, at Los Angeles, California.


Olympia Peña