

Aaron A. Bartz (SBN 198722)
BARTZ LAW GROUP, APC
5151 California Ave., Suite 100
Irvine, California 92617
Tel: (949) 504-4413
Fax: (949) 656-7760
Email: aaron@bartzlawgroup.com

Walter L. Haines, Esq. (SBN 71075)
UNITED EMPLOYEES LAW GROUP, PC
8605 Santa Monica Blvd., #63354
West Hollywood, CA 90069
Tel.: (562) 256-1047 / Fax: (562) 256-1006
Email: walter@uelglaw.com

Attorneys for Plaintiff KELSEY WOLFF, on behalf of herself and other aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

KELSEY WOLFF, an individual; on behalf of
herself and other aggrieved employees,

Plaintiffs,

vs.

ENTERPRISE FLEET MANAGEMENT,
INC., a Missouri corporation; and DOES 1
through 100, inclusive,

Defendants.

Case No. 23STCV16885

*[Assigned For All Purposes To Judge Kevin C.
Brazile, Dept. 20]*

RESERVATION ID. # 429798124410

**DECLARATION OF KELSEY WOLFF IN
SUPPORT OF MOTION TO APPROVE
PAGA SETTLEMENT**

Date: July 2, 2024
Time: 8:30 a.m.
Dept.: 20

1 I, KELSEY WOLFF, declare as follows:

2 1. I am over the age of eighteen and am a named Plaintiff in *Kelsey Wolff v.*
3 *Enterprise Fleet Management, Inc.* The foregoing is based upon my personal knowledge and, if
4 called as a witness, I could and would competently testify thereto.

5 2. I submit this declaration in support of Plaintiff's Motion for Approval of Private
6 Attorneys General Act Settlement Agreement.

7 3. I was previously employed by Defendant Enterprise Fleet Management, Inc.
8 ("Defendant") between 2021 and 2022 as a non-exempt hourly employee. During my time
9 working for Defendant, I was subjected to the same wage and hour policies and practices that are
10 at issue in this case, including Defendant's practice of failing to pay employees all wages owed,
11 including off-the-clock compensation, failing to provide meal periods, failing to authorize and
12 permit rest periods, failing to provide accurate wage statements, reimbursement, and related
13 issues.

14 4. Prior to getting involved in this case, I spoke with my attorneys for many hours to
15 understand the nature of the case, and shared with my attorneys the wage and hour violations that
16 I experienced while working for Defendant. After I became involved in this case, I assisted my
17 attorneys in reviewing and understanding the numerous documents exchanged during informal
18 discovery. I reviewed many of Defendant's policy documents with my attorneys, and answered
19 my attorney's questions relating to those documents.

20 5. During the informal discovery process, I assisted my attorneys with interpreting
21 various documents produced, and discussed with my attorneys strategies to ensure that the
22 settlement was fair to all of the aggrieved employees.

23 6. I believe that this PAGA Settlement is a good result given the various issues
24 involved with the case, and the recovery of penalties for the State of California and aggrieved
25 employees is fair, reasonable and adequate.

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 April 22, 2024, at Anaheim, California.

4  DocuSigned by:
Kelsey Wolff

5
6 Kelsey Wolff
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28