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Attorneys for Defendants

KEMPER SPORTS MANAGEMENT, LLC and KEMPER SPORTS MANAGEMENT HOLDINGS, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

KIMBERLY M. WILHELM, as an individual
and on behalf of all employees similarly situated,

Plaintiff,

v.

KEMPER SPORTS MANAGEMENT, LLC, a
Delaware Limited Liability Company; KEMPER
SPORTS MANAGEMENT HOLDINGS, LLC,
a Delaware Limited Liability Company, and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 30-2024-01376524-CU-OE-CXC

[Assigned for all purposes to Hon. Randall J.
Sherman, Dept. CX105]

**CLASS AND PAGA REPRESENTATIVE
ACTION**

**DECLARATION OF ANDREW M.
MCNAUGHT IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND PAGA REPRESENTATIVE
ACTION SETTLEMENT**

Reservation N: 74532524

Date: July 25, 2025

Time: 10 a.m.

Courtroom: Dept. CX105

Judge: Hon. Randall J. Sherman

Action Filed: January 30, 2024

Trial: Not Set

I, Andrew M. McNaught, hereby declare:

2. I submit this Declaration in connection with Plaintiff Kimberly M. Wilhelm’s (“Plaintiff”) Motion for Preliminary Approval of Class Action and Private Attorney PAGA Settlement, related to the settlement between Plaintiff and Defendants in this matter (“Settlement”). The Settlement resolves the claims brought by Plaintiff against Defendants entitled *Kimberly M. Wilhelm v. Kemper Sports Management LLC, Kemper Sports Management Holdings, LLC and Does 1 through 50, inclusive*, currently pending in Superior Court of the State of California, County of Orange, Case No. 30-2024-01376524-CU-OE-CXC. I am not aware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

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

AS. M.

**DECLARATION OF ANDREW M. MCNAUGHT IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF
CLASS AND PAGA REPRESENTATIVE ACTION SETTLEMENT**

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3) ss
4 COUNTY OF LOS ANGELES)

5 I am employed in the county of Los Angeles, State of California. I am over the age of
6 18 and not a party to the within action; my business address is 355 S. Grand Ave., Suite 1450
7 Los Angeles, CA 90071.

8 On the date indicated below, I served the document described as: **DECLARATION OF ANDREW M.
9 MCNAUGHT IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF
10 CLASS AND PAGA REPRESENTATIVE ACTION SETTLEMENT** on the interested parties in
11 this action by sending a true copy thereof to interested parties as follows and as stated on the
12 attached service list:

13 **SEYFARTH SHAW LLP**

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Attorneys for Defendants KEMPER SPORTS MANAGEMENT, LLC, KEMPER SPORTS
MANAGEMENT HOLDINGS, LLC

20 [✓] **BY E-MAIL:** I hereby certify that this document was served from Glendale, California,
21 by e-mail delivery on the parties listed herein at their most recent known e-mail address
22 or e-mail of record in this action.

23 [✓] **BY ELECTRONIC SERVICE:** Based on an agreement of the parties to accept electronic
24 service, I caused the documents to be sent to the persons at the electronic service addresses listed
25 above via electronic mail. I did not receive an error message.

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

28 Executed on April 10, 2025 at Los Angeles, California.

Karen Arellano

Name

Signature