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10 Attorneys for Defendants
11 WORLD COURIER INC. and WORLD CUSTOMS
12 BROKERAGE, INC.

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **COUNTY OF LOS ANGELES**

15 RACHAEL LIEBREGT, an individual, on
16 behalf of herself, and on behalf of all persons
17 similarly situated,

18 Plaintiffs,

19 v.

20 WORLD COURIER INC., a New York
21 corporation; CENCORA, INC., a Delaware
22 corporation; AMERISOURCEBERGEN
23 DRUG CORPORATION, a Delaware
24 corporation; AMERISOURCEBERGEN
25 SERVICES CORPORATION, a Delaware
26 corporation; AMERISOURCEBERGEN
27 SPECIALTY GROUP, LLC, a Delaware
28 limited liability company; and DOES 1-50,
Inclusive,

Defendants.

Case No. 24STCV05865

Honorable David S. Cunningham
Dept. 11

**DECLARATION OF ANDREW P.
FREDERICK IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

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1. I am a partner with the law firm of Morgan, Lewis & Bockius LLP (“Morgan Lewis”) and am counsel of record for Defendants World Courier Inc. and World Customs Brokerage, Inc. (“Defendants”). I make this declaration in connection with Plaintiff’s motion for preliminary approval of the class action and PAGA settlement proposed by the Parties in this matter. I make this declaration based on my own personal knowledge such that if I was called to testify, I could and would competently testify thereto.

3. I am unaware of any other pending matter or action asserting claims that will be extinguished or adversely affected by the settlement of this putative class and representative action.

Executed this 23rd day of May 2025 in Palo Alto, California.

Andrew P. Frederick