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Attorneys for Plaintiffs and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

JALON STANLEY, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

NORTH STAR EMERGENCY
SERVICES INC.; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 24CV082930

**DECLARATION OF KRISTEN M. AGNEW IN
SUPPORT OF PLAINTIFFS’ MOTION FOR
PRELIMINARY APPROVAL OF CLASS AND
REPRESENTATIVE ACTION SETTLEMENT**

Date: May 19, 2026
Time: 2:30 P.M.
Dept.: 21

Reservation No.: 924738831245

Action Filed: July 10, 2024
Trial Date: None Set

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I, Kristen M. Agnew, declare as follows:

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 Plaintiff Jalon Stanley (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I have spent significant time researching and pursuing the claims that have been alleged in this action. Based on my own independent investigation and evaluation, I am of the opinion that settlement for the consideration and terms set forth the Joint Stipulation of Class Action and PAGA Settlement and Release of Claims (“Agreement”) is fair, reasonable, and adequate and is in the best interests of the Class in light of all known facts and circumstances and the expenses and risks inherent in litigation.

3. My qualifications are as follows: I was the 2003 recipient of the Spelman Presidential Scholarship to Emory University School of Law. During law school, I was a summer associate at the law firm of Sonnenschein, Nath and Rosenthal, and clerked with the Atlanta office of the Equal Employment Opportunity Commission. I received my J.D. from Emory University in 2006 and was admitted to the California Bar in December 2006. Following law school, I was an associate at Sonnenschein from September 2006 to May 2009.

4. Since 2009, my primary area of practice has been employment litigation. I have practiced law at two pre-eminent 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 Employment and Housing Act, the California Labor Code and the Fair Labor Standards Act. I also handled a number of wage and hour class actions.

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

3 6. I have been approved as class counsel in numerous other wage/hour class actions
4 that have been granted class certification and final approval, including: *Antonio Becerra-Mata v.*
5 *PSC Industrial Outsourcing, LP*, San Benito County Superior Court Case No. CU-15-00030;
6 *Kosal So v. Owens-Brockway Glass Container, Inc.*, Los Angeles County Superior Court Case
7 No. BC608609; *Sarah Rodriguez v. Manpower, Inc.*, Santa Clara County Superior Court Case
8 No. 1-16-CV-294904; *Shannon Sanchez v. American Para Professional Systems, Inc.*, Santa
9 Clara County Superior Court Case No. 17CV306751; *Foaad Hanna v. Equinix, LLC*, Santa Clara
10 County Superior Court Case No. 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles
11 County Superior Court Case No. BC720144; *Mary Della Maggiora v. Watsonville Community*
12 *Hospital*, Santa Cruz Superior Court Case No. 18CV00191; *Michael Randolph v. Pacific Racing*
13 *Association*, Alameda County Superior Court Case No. RG18908139; *Cody Wirbick v. Sundt*
14 *Construction, Inc.*, U.S. District Court for the Eastern District of California Case No. 2:19-cv-
15 02067-MCE-CKD; *Jose Vasquez Ruiz v. Perdue Foods, LLC*, Sonoma County Superior Court
16 Case No. SCV 264649; *Delmer Wood III v. Reeve Trucking Company Inc.*, San Joaquin
17 Superior Court Case No. STK-CV-UOE-2018-0004414; *Eric Chavez v. Converse, Inc.*, U.S.
18 District Court for the Northern District of California Case No. 15-cv-03746-NC; *Jharett Siron v.*
19 *Raypak, Inc.*, Ventura County Superior Court Case No. 56-2019-00527959-CU-OE-VTA;
20 *Prexxie Pascual and Arturo Fonseca v. Satellite Healthcare, Inc.*, Santa Clara Superior Court
21 Case No. 19CV345211; and *Markham v. Quik Stop Markets, Inc.*, Santa Clara Superior Court
22 Case No. 19CV341582.

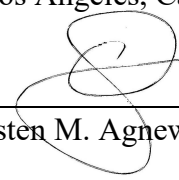
23 7. I was lead trial counsel on two bench trials, in which the Plaintiff was the
24 prevailing party. The cases are: *Esteban Palomino v. Northrop Grumman Systems Corporation*,
25 Santa Clara County Superior Court Case No. 19CV345534; and *Jose Delgado v. Taylor Farms*
26 *California, Inc.*, Monterey County Superior Court Case No. 18CV001381.

27 8. My co-counsel and I will adequately represent the Class Members in this action.
28 Plaintiff's counsel have and will zealously represent Plaintiff and the Class and pursue this

lawsuit to its conclusion.

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

Executed on this 27th of April 2026, at Los Angeles, California.



Kristen M. Agnew