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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN

ANNAALICIA LEBLANC, as an
individual and on behalf of all others
similarly situated,

Plaintiff,

vs.

O’CONNOR WOODS HOUSING
CORPORATION, a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No.: STK-CV-UOE-2024-0009405

[Assigned to the Hon. Robert T. Waters, Dept. 11B]

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

Date: 11/26/25, 12/2/25, 12/3/25, 12/4/25, 12/9/25

Time: 9:00 a.m.

Dept.: 11B

Action Filed: August 7, 2024

Trial Date: None

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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, counsel of record for Plaintiff Annaalicia LeBlanc (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. From the inception of the case, Class Counsel has zealously represented the interests of the Class. I have no conflicts with the Class and will adequately represent the Class.

3. I believe that Plaintiff and the Class could prevail at trial. However, I also believe in the fairness of the settlement, which is based on factoring in the uncertainty and risks attendant to not prevailing on one or more theories of liability, the possibility of losing at trial, and the potential for appeals. Moreover, as Defendant adamantly denies that it should be liable for the full extent of the alleged damages and penalties, there is a possibility that Plaintiff and the Class would be awarded less or recover nothing at trial. Thus, after taking into account the sharply disputed legal issues involved in this litigation, the risks associated with further prosecution, delays caused by potential appeals, and the substantial benefits to be received pursuant to the Settlement Agreement, I believe that the proposed settlement is fair, reasonable, and adequate and is in the best interests of the Class.

4. 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.

5. 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

1 June 2011 to May 2016. At both Ogletree and Seyfarth, I represented a wide array of fortune 500
2 companies in employment litigation in both state and federal courts, as well as before
3 government agencies, including the California Department of Labor. My practice included the
4 defense of single plaintiff and multi-plaintiff lawsuits involving claims under the California Fair
5 Employment and Housing Act, the California Labor Code and the Fair Labor Standards Act. I
6 also handled a number of wage and hour class actions.

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

9 7. I served as the lead associate on a number of wage and hour class actions,
10 including *Martha Cardenas v. Gold's Gym*, Los Angeles County Superior Court Case No.
11 BC445112; *Nathaniel Werner v. Crown Equipment Corporation*, Los Angeles County Superior
12 Court Case No. BC439428; *Christopher Williams v. Allstate Insurance Co.*, Los Angeles County
13 Superior Court Case No. BC382577; *Hwang v. Caltech*, Los Angeles County Superior Court
14 Case No. BC464894; *Melissa Roberts v. Zale Delaware, Inc.*, Los Angeles Superior Court Case
15 No. BC523610; *Michael Oliver v. Konica Minolta Business Solutions U.S.A., Inc.*, Santa Clara
16 County Superior Court Case No. 114-CV-263183; *Tessa Hodge v. Zale Delaware, Inc., d/b/a*
17 *Piercing Pagoda*, San Bernardino Superior Court Case No CIVVS1301632; *Warren v. Paychex,*
18 *Inc.*, N.D. Cal. Case No. 3:10-cv-02006; *Tapia v. Zale Delaware Inc. et al*, S.D. Cal. Case No.
19 3:13-cv-01565; and *Benjamin Burgess et al v. Tesoro Refining and Marketing Company et al*,
20 C.D. Cal. Case No. 2:10-cv-05870.

21 8. I have been approved as class counsel in a number of class actions by the Superior
22 Courts of California and United States District Courts, including: *Antonio Becerra-Mata v. PSC*
23 *Industrial Outsourcing, LP*, San Benito County Superior Court Case No. CU-15-00030; *Andrew*
24 *Vasquez v. Earthbound Farm, LLC*, San Benito County Superior Court Case No. CU-17-00171;
25 *Francisco Pulido v. Westrock Services, Inc.*, San Benito County Superior Court Case No. CU-
26 18-00074; *Kosal So v. Owens-Brockway Glass Container, Inc.*, Los Angeles County Superior
27 Court Case No. BC608609; *John Obiols v. Lockheed Martin Corporation*, Santa Clara County
28 Superior Court Case No. 17CV314178; and *Eric Chavez v. Converse, Inc.*, N.D. Cal. Case No.

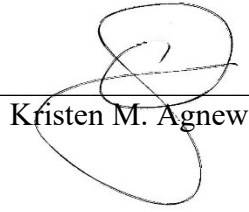
1 15-cv-03746-NC.

2 9. I also second chaired two jury trials where I represented the prevailing defendant.
3 Both cases involved employees who brought claims against their former employers pursuant to
4 the Fair Employment & Housing Act. The cases are: *Jeff Cowell v. Eaton Aerospace LLC et al*,
5 Los Angeles County Superior Court Case No. BC401543; and *Richard Gulden v. Pratt &*
6 *Whitney Rocketdyne Inc. et al.*, Los Angeles County Superior Court Case No. BC468909. More
7 recently, I was lead trial counsel on two class and representative PAGA bench trials, in which the
8 plaintiff was the prevailing party.

9 10. I have no conflicts with Legal Aid at Work, which is the *cy pres* beneficiary of
10 this proposed settlement.

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

13 Executed on this 30th day of October 2025, at Los Angeles, California.

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Kristen M. Agnew