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SUPERIOR COURT

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TRUDY L. HALEY
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Attorneys for Defendants
CONCRETE, INC., D/B/A KNIFE RIVER
CONSTRUCTION, MDU RESOURCES GROUP, INC.,
D/B/A KNIFE RIVER CONSTRUCTION, AND KNIFE
RIVER CONSTRUCTION

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN JOAQUIN

KENNETH WILBURN, individually, and on
behalf of all others similarly situated,

Plaintiff,

v.

CONCRETE, INC., d/b/a KNIFE RIVER
CONSTRUCTION, a California corporation,
MDU RESOURCES GROUP, INC., d/b/a KNIFE
RIVER CONSTRUCTION, a Delaware
corporation, KNIFE RIVER CONSTRUCTION, a
Delaware corporation, and DOES 1 through 10,
inclusive,

Defendants.

Case No. STK-CV-UOE-2021-0010183

Consolidated with Case No. STK-CV-UOE-
2022-0002317

**DECLARATION OF RYAN L. EDDINGS
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

ASSIGNED FOR ALL PURPOSES TO
JUDGE ROBERT T. WATERS, DEPT. 11B

I, Ryan Eddings declare as follows:

1. I am over 18 years old and am an attorney licensed to practice law in the State of California. I am an attorney and shareholder at the firm Littler Mendelson, P.C., counsel of record for Defendants CONCRETE, INC., D/B/A KNIFE RIVER CONSTRUCTION, MDU RESOURCES GROUP, INC., D/B/A KNIFE RIVER CONSTRUCTION, AND KNIFE RIVER CONSTRUCTION

1 (collectively, "Defendants"). I have personal knowledge of the following facts and, if called to testify,
2 I could and would competently testify thereto.

3 2. Section 7.1 of the Parties' Settlement Agreement in this action requires Defense
4 Counsel to submit a Declaration to disclose facts relevant to any conflict of interest with the
5 Administrator or Cy Pres Recipient and whether Defendant is aware of any other pending matter
6 asserting claims that will be extinguished by this settlement. Defendant has no conflict of interest with
7 the Administrator and/or the Cy Pres Recipient. Further, Defendant is unaware of any other pending
8 matter or action asserting claims that will be extinguished or adversely affected by the Settlement.

9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct. Executed this 20th day of July 2023 at Fresno, California.

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RYAN L. EDDINGS

4856-0133-6689.1 / 092098-1006

Wilburn v. Concrete, Inc., et al.
STK-CV-UOE-2021-0010183

I, Sandy S. Sespene, state that I am employed in the aforesaid County, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 3055 Wilshire Blvd., 12th Floor, Los Angeles, California 90010. My electronic service address is ssespene@wilshirelawfirm.com.

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(X) **BY E-MAIL:** I hereby certify that this document was served from Los Angeles, California, by e-mail delivery on the parties listed herein at their most recent known email address or e-mail of record in this action.

(X) **BY UPLOAD:** I hereby certify that the documents were uploaded by my office to the State of California Labor and Workforce Development Agency Online Filing Site.

Executed on July 20, 2023, at Los Angeles, California.


Sandy S. Sespene