1111111 SurtHOR COUNT Ryan L. Eddings, Bar No. 256519 1 2023 JUL 20 PH 2: ~1 reddings@littler.com 2 Cody S. Chapple, Bar No. 332206 SHAR WELKLEY OFFIC cchapple@littler.com 3 LITTLER MENDELSON, P.C. TRUDY L. HALEY 5200 North Palm Avenue 4 Suite 302 Fresno, California 93704.2225 5 Telephone: 559.244.7500 559.244.7525 Fax No.: 6 Attorneys for Defendants 7 CONCRETE, INC., D/B/A KNIFE RIVER CONSTRUCTION, MDU RESOURCES GROUP, INC., D/B/A KNIFE RIVER CONSTRUCTION, AND KNIFE 8 RIVER CONSTRUCTION 9 SUPERIOR COURT OF THE STATE OF CALIFORNIA 10 **COUNTY OF SAN JOAQUIN** 11 12 KENNETH WILBURN, individually, and on Case No. STK-CV-UOE-2021-0010183 13 behalf of all others similarly situated, Consolidated with Case No. STK-CV-UOE-14 Plaintiff, 2022-0002317 15 **DECLARATION OF RYAN L. EDDINGS** ٧. IN SUPPORT OF PLAINTIFF'S 16 CONCRETE, INC., d/b/a KNIFE RIVER MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION CONSTRUCTION, a California corporation, 17 MDU RESOURCES GROUP, INC., d/b/a KNIFE SETTLEMENT RIVER CONSTRUCTION, a Delaware 18 corporation, KNIFE RIVER CONSTRUCTION, a 19 Delaware corporation, and DOES 1 through 10, inclusive, ASSIGNED FOR ALL PURPOSES TO JUDGE ROBERT T. WATERS, DEPT. 11B 20 Defendants. 21 22

I, Ryan Eddings declare as follows:

I am over 18 years old and am an attorney licensed to practice law in the State 1. 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

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LITTLER MENDELSON, P.C. \$700 North Palm Arenue Surie 302 Frezne, CA 93704 2225 559 244 7500

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

FILED BY FAX

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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12	Kyan Edden
13	RYAN L. EDDINGS
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1	PROOF OF SERVICE
2	Wilburn v. Concrete, Inc., et al. STK-CV-UOE-2021-0010183
3	STATE OF CALIFORNIA)
4	COUNTY OF LOS ANGELES) ss
5	I Sanda S Sanda at that I am amulawal in the aforest il Country State of California
6	I, Sandy S. Sespene, state that I am employed in the aforesaid County, State of Californ I am over the age of eighteen years and not a party to the within action; my business address 3055 Wilshire Blvd., 12 th Floor, Los Angeles, California 90010. My electronic service address seespene@wilshirelawfirm.com.
7	
8	On July 20, 2023, I served the foregoing DECLARATION OF RYAN L. EDDINGS IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, on the interested parties by placing a true copy thereof, enclosed in a sealed envelope by following one of the methods of service as follows:
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11	Ryan L. Eddings (SBN 256519) Victoria A. Kovanis (SBN 289275)
12	reddings@littler.com LITTLER MENDELSON, P.C. vkovanis@littler.com LITTLER MENDELSON, P.C.
13	5200 North Palm Avenue Ste. 302 Fresno, California 93704 500 Capitol Mall Ste. 2000 Sacramento, California 95814
14	Tel: (559) 244-7500 Tel: (916) 830-7200 Fax: (559) 244-7525 Fax: (916) 561-0828
15	Attorneys for Defendants Concrete, Inc., d/b/a Knife River and MDU Resources Group, Inc.
16	
17	(X) BY E-MAIL: I hereby certify that this document was served from Los Angele California, by e-mail delivery on the parties listed herein at their most recent know email address or e-mail of record in this action.
18	
19	(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.
20	
21	I declare under the penalty of perjury under the laws of the State of California, that th foregoing is true and correct.
22	
23	Executed on July 20, 2023, at Los Angeles, California.
24	Sandy S. Sespene
25	Sandy S. Sespene
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