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Executive Officer/Clerk of Court,
By J. Covarrubias, Deputy Clerk**

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14 *Attorneys for Plaintiffs and the Class*

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
16 FOR THE COUNTY OF LOS ANGELES

17 HOLLY WEDDING, et al.,
18 Plaintiffs,

19 vs.

20 CALIFORNIA PUBLIC EMPLOYEES’
21 RETIREMENT SYSTEM, et al.,

22 Defendants.
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Case No. BC517444
JCCP Case No. 4936
[Hon. William F. Highberger]

**DECLARATION OF HOLLY WEDDING
IN SUPPORT OF PLAINTIFFS’ (1)
MOTION FOR FINAL APPROVAL OF
SECOND CLASS ACTION
SETTLEMENT; AND (2) MOTION FOR
AWARD OF ATTORNEYS’ FEES AND
COSTS, SERVICE AWARDS AND
ADMINISTRATION EXPENSES**

Date: July 26, 2023
Time: 11:00 a.m.
Dept.: 10 – Spring Street Courthouse

1 I, Holly Wedding, do hereby declare as follows:

2 1. I am one of the Plaintiffs in this class action case. I have personal knowledge of
3 the facts stated herein and could testify to these facts under oath.

4 2. I previously filed a declaration on September 15, 2015, in support of Plaintiffs'
5 motion to certify a class in this case and was appointed to serve as a class representative. I am
6 familiar with the Court's Order of January 28, 2016, certifying the Class. I also filed a
7 declaration on February 27, 2023, in support of Plaintiffs' Motion for Preliminary Approval of
8 Second Class Action Settlement, and I am familiar with the Court's Order of March 10, 2023,
9 granting preliminary approval of Second Class Action Settlement.

10 3. I am a member of the litigation Class certified in 2016, and the Settlement Class
11 previously certified by the Court in 2021. In or around 1997, I purchased a CalPERS Long-Term
12 Care Policy with automatic inflation protection and lifetime benefits. I continuously paid my
13 premiums for the policy, but recently stopped paying premiums because I have gone on claim.

14 1. In or around February 2013, I received a notice of a rate increase that was to be
15 implemented over a two-year period starting in 2015 and that would increase my premiums by
16 85%. I decided to pay the rate increase to keep my automatic inflation protection and lifetime
17 benefits, even though it was financially very difficult for me. In about April or May 2013, I
18 reached out to counsel Stuart Talley see if there was anything that could be done about the 85%
19 rate increase that was announced by CalPERS in 2013. Before reaching out to Mr. Talley, I had
20 not previously known him.

21 4. I am familiar with all the allegations that have been asserted in this lawsuit and I
22 am familiar with the Court's Orders that have affected the claims and allegations. I have been
23 actively involved in the prosecution of this case from 2013 when I reached out to retain counsel
24 to assist me. I agreed to file a complaint against the California Public Employees' Retirement
25 System ("CalPERS") in 2013 and I was a named plaintiff in the complaint filed in August 2013.
26 I have had regular contact with my attorneys regarding the progress of the case.

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1 5. I have devoted significant time to gathering essential information for Class
2 Counsel to assist in researching the merits of the claims asserted here. I have been deposed on
3 two separate days in this case (over 30 hours of deposition time and preparation time). I have
4 responded to discovery served on me, including 13 sets of written discovery comprised of 5 sets
5 of interrogatories, 6 sets of document requests and 2 sets of requests for admission (over 35
6 hours of time, which included gathering hundreds of pages of our documents for production). I
7 personally produced 670 pages of documents from my files. I received regular updates on and
8 followed the status and progress of the lawsuit, spending over 125 hours of time attending the
9 first phase of the trial, attending hearings on class certification, preliminary and final approval of
10 settlements, attending remote hearings following the pandemic, reviewing documents that have
11 been filed throughout this litigation, including various orders issued by the Court and providing
12 edits and suggested changes to various documents. I live in Bakersfield and I had to travel to
13 attend mediations in Newport Beach, the trial in Los Angeles and for other hearings and I had to
14 incur expenses for that travel.

15 6. I have devoted at least 40 hours to participating in the mediations that occurred in
16 this case before the Honorable Layn Phillips (Ret.) and also Nancy Lesser who mediated the
17 settlement with the Towers Defendants. I am familiar with the Prior Settlement with CalPERS
18 and filed a declaration in support of the Prior Settlement in July 2021. I participated in numerous
19 settlement discussions since the Prior Settlement was terminated, and I am familiar with the
20 terms of the Second Class Action Settlement. And I have reviewed in detail the Second Class
21 Action Settlement Agreement and Release, which I signed on February 27, 2023.

22 7. From my perspective as a long-time CalPERS policyholder and class member, I
23 believe the Settlement here provides meaningful relief and is a great result for the Class I have
24 worked so hard to represent over the nearly 10 years of this litigation.

25 8. I have been involved in every aspect of this case and by my personal estimate
26 have devoted over 250 hours of time to this litigation.

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1 9. I am also aware of the extensive work and effort by Class Counsel. Since the
2 inception of this case, Class Counsel have worked tirelessly on behalf of the Class. Class
3 Counsel made certain to provide me with regular updates on the status of the case and made
4 certain that I was informed of the various orders issued by the Court throughout this litigation.
5 Class Counsel made certain that I was actively involved in all settlement discussions as well as
6 motion and trial practice in this case.

7 10. I am familiar with my responsibilities as a class representative, including my duty
8 to look out for the interests of other members of the Class and not solely my own. Throughout
9 my work on this case, I have kept the interests of the Class in mind and sought to do what is in
10 the best interests of all Class members.

11 11. I am not aware of any conflicts between myself and any other member of the
12 proposed Settlement Class or the Class that was previously certified by the Court that would
13 prevent me from serving as a class representative.

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

16 Executed this 3rd day of July, 2023, in Bakersfield, California.

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DocuSigned by:
Holly Wedding
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Holly Wedding