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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SOLANO

DIEN TRUONG, as an individual and on
behalf of all others similarly situated,

Plaintiffs,

vs.

DS SERVICES OF AMERICA, INC., a
Delaware corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: FCS054399

[Assigned to the Hon. E. Bradley Nelson, Dept. 4]

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: March 29, 2021

Time: 9:00 a.m.

Dept.: 4

ADDITIONAL ATTORNEYS

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Attorneys for Plaintiff, the Class, and Aggrieved Employees

1 I, Larry W. Lee, hereby declare and state as follows:

2 1. I am an attorney at law duly admitted to practice before all courts in the State of
3 California and am a member of the law firm of the Diversity Law Group, P.C., one of the
4 attorneys of record for Plaintiff Dien Truong ("Plaintiff"), in the above entitled action.

5 2. I have personal knowledge of the matters set forth herein, and if called upon as a
6 witness to testify thereto, I could and would competently do so.

7 3. Based on their own independent investigation and evaluation, the Parties and their
8 respective counsel are of the opinion that settlement for the consideration and terms set forth in
9 the Settlement Agreement is fair, reasonable, and adequate and is in the best interests of the
10 Class and Defendant in light of all known facts and circumstances and the expenses and risks
11 inherent in litigation.

12 4. I am one of the primary attorneys on this matter. My qualifications are as follows:
13 I received my J.D. from Arizona State University College of Law in 2003. During law school, I
14 was a summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated cum laude
15 from Arizona State University College of Law in the top 10% of my class. While I was in law
16 school, I was the Associate Managing Editor of the Arizona State University College of Law,
17 Law Journal. Upon graduation, I practiced law as an associate at the Los Angeles County offices
18 of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment defense law firm that
19 represents a significant number of Fortune 500 companies.

20 5. My firm's primary focus is employment law. I have handled a number of wage
21 and hour matters including class actions and multiple-plaintiff actions. I have a practice that
22 encompasses cases in the Los Angeles Superior Courts, the Orange County Superior Courts, the
23 San Francisco County Superior Courts, the San Diego County Superior Courts, and the United
24 States District Courts for the Central, Eastern and Northern Districts of California.

25 6. I have been named as Class Counsel in a number of class actions that have been
26 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
27 Francisco County, and the United States District Court for the Central District of California,
28 including the following Class Actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco

1 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County
2 Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV
3 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court,
4 Judicial Council Coordination Proceeding No. 4480; and *Hernandez v. CVS Corp. et al.*, Judicial
5 Council Coordination Proceeding No. 4539.

6 7. My co-counsel and I will adequately represent the Class Members in this action.
7 Plaintiff's Counsel have and will zealously represent Plaintiff and the Class and pursue this
8 lawsuit to its conclusion.

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

11 Executed on March 3, 2021, at Los Angeles, California.

12 
13 _____
14 Larry W. Lee