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Attorneys for Plaintiff and the Class

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

ARRON STANFIELD, as an individual
and on behalf of all others similarly
situated,

Plaintiffs,

vs.

THE F.A. BARTLETT TREE EXPERT
COMPANY, a Connecticut corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: SCV-265929

[Assigned for all purposes to the Honorable Patrick
Broderick, Dept. 16]

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

Date: TBD
Time: TBD
Dept.: 16

Complaint Filed: January 28, 2020
Trial Date: None Set

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I, Larry W. Lee, 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 Arron Stanfield (“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 spent significant time researching and pursuing the claims that have been alleged in this action.

3. Based on my own independent investigation and evaluation, I am of the opinion that settlement for the consideration and terms set forth in the Joint Stipulation of Class and Representative Action Settlement (“Stipulation” or “Settlement Agreement”) is fair, reasonable, and adequate and is in the best interests of the Class in light of all known facts and circumstances and the expenses and risks inherent in litigation. The Settlement was obtained for the benefit of the Class, as opposed to the individual Class Representative.

4. Both Plaintiff's and Defendant's counsel have a great deal of experience in wage and hour class action litigation. Plaintiff's counsel has been approved as class counsel in a number of wage and hour class actions and has extensive litigation experience.

5. I was retained based upon a contingency fee arrangement wherein Plaintiff's counsel agreed to advance all costs and receive no fee unless a recovery was accomplished. Specifically, had Plaintiff failed to prevail on this case, counsel for Plaintiff would have spent a significant amount of time, money and other resources without any benefit or return. In addition, had Plaintiff also failed to prevail in the present case, Defendant would have been able to seek attorney's fees and costs in connection with their defense of the case.

6. I am one of the primary attorneys on this matter. My qualifications are as follows: I received my J.D. from Arizona State University College of Law in 2003. During law school, I was a summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated cum laude from Arizona State University College of Law in the top 10% of my class. While I

1 was in law school, I was the Associate Managing Editor of the Arizona State University College
2 of Law, Law Journal. Upon graduation, I practiced law as an associate at the Los Angeles
3 County offices of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment
4 defense law firm that represents a significant number of Fortune 500 companies.

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

10 8. I have been named as Class Counsel in a number of class actions that have been
11 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
12 Francisco County, and the United States District Court for the Central District of California,
13 including the following Class Actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco
14 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County
15 Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV
16 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court,
17 Judicial Council Coordination Proceeding No. 4480; and *Hernandez v. CVS Corp. et al.*, Judicial
18 Council Coordination Proceeding No. 4539.

19 9. My co-counsel and I will adequately represent the Class Members in this action.
20 Plaintiff's Counsel have and will zealously represent Plaintiff and the Class and pursue this
21 lawsuit to its conclusion.

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

24 Executed on this 30th day of October, 2020, at Los Angeles, California.

25
26 
27 _____
28 Larry W. Lee