

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
Nicholas Rosenthal (State Bar No. 268297)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile

William L. Marder, Esq. (State Bar No. 170131)
Polaris Law Group LLP
501 San Benito Street, Suite 200
Hollister, CA 95023
Tel: (831) 531-4214
Fax: (831) 634-0333

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
M. Broderick, Dept. 16]

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

Date: May 26, 2021

Time: 3:00 p.m.

Dept.: 16

Complaint Filed: January 28, 2020

Trial Date: None Set

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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 Named Plaintiff Stanfield (“Plaintiff”). I have personal knowledge of the facts set forth below and if called upon I could and would do so competently.

3. I support the settlement as fair, reasonable, and adequate, and in the best interest of the Class Members as a whole.

5. My primary practice is employment law. I have handled a number of wage and hour matters including class actions and individual actions, on both plaintiff and defense sides. I have a practice that encompasses cases throughout the State of California, including but not limited to the Los Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County Superior Courts, the San Diego County Superior Courts, and the United States

1 District Courts for the Central, Eastern, Northern, and Southern Districts of California. I have
2 been named as Class Counsel in a number of class actions that have been granted final approval
3 by the Superior Courts of Los Angeles County, Orange County, San Francisco County, Alameda
4 County, Contra Costa County, Monterey County, San Bernardino County, Santa Clara County,
5 Sonoma County, and the United States District Court for the Central, Eastern, and Northern
6 Districts of California, including but not limited to the following class actions: *Chan Lanier v.*
7 *Citigroup, Inc. et al.*, San Francisco Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic*
8 *Home Loans et al.*, Orange County Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central
9 District of California Case No. CV 06-0196-RSWL (PJWx); *Universal Protection Overtime*
10 *Cases*, Orange County Superior Court Case No. JCCP 4480; *Tse v. Best Buy*, Los Angeles
11 Superior Court Case No. BC392717; and *Hernandez v. CVS Corporation*, Los Angeles Superior
12 Court Case No. JCCP 4539.

13 6. I have been approved as class counsel in numerous other wage/hour class actions
14 that have been granted class certification and final approval.

15 7. My firm has incurred costs in the amount of \$11,465.67. The costs are all
16 litigation related costs, including filing fees, mediation fees, postage, messenger charges, copy
17 costs, and service fees. Attached hereto as **Exhibit A** is copy of the costs my firm has incurred in
18 connection with prosecution of this lawsuit.

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

21 Executed on this 4th day of April 2021, at Los Angeles, California.

22
23 
24 Larry W. Lee

EXHIBIT A

4/28/2021
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DIVERSITY LAW GROUP
Slip Listing

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Selection Criteria

Slip Classification Open
Client (hand select) Include: Stanfield, Arron v. FA
Slip.Transaction Ty 2 - 2

Rate Info - identifies rate source and level

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
60895	EXP	Olympia	1	75.00	75.00
1/9/2020		Court fees			
WIP		Stanfield, Arron v. FA			
LWDA					
61327	EXP	Olympia	1	1478.06	1478.06
1/28/2020		Court fees			
WIP		Stanfield, Arron v. FA			
Odyssey - Complaint					
61439	EXP	Olympia	1	63.25	63.25
1/30/2020		Atty Service			
WIP		Stanfield, Arron v. FA			
Attorney Service - Service of Complaint					
61538	EXP	Olympia	1	7.30	7.30
1/31/2020		Postage			
WIP		Stanfield, Arron v. FA			
Postage					
61342	EXP	Olympia	1	3.60	3.60
2/4/2020		Court fees			
WIP		Stanfield, Arron v. FA			
Odyssey - POS of Summons					
61365	EXP	Olympia	1	3.60	3.60
2/5/2020		Court fees			
WIP		Stanfield, Arron v. FA			
Odyssey - Notice of ADR					
61575	EXP	Olympia	1	3.60	3.60
2/14/2020		Court fees			
WIP		Stanfield, Arron v. FA			
Odyssey - Notice of Complex Designation					
61652	EXP	Olympia	1	3.60	3.60
2/27/2020		Court fees			
WIP		Stanfield, Arron v. FA			
Odyssey - Amended POS					

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
61914 EXP 2/28/2020 WIP Photocopies	Olympia Photocopies Stanfield, Arron v. FA	51	0.25	12.75
61915 EXP 2/28/2020 WIP Postage	Olympia Postage Stanfield, Arron v. FA	1	2.90	2.90
62554 EXP 4/30/2020 WIP Photocopies	Olympia Photocopies Stanfield, Arron v. FA	22	0.25	5.50
62555 EXP 4/30/2020 WIP Postage	Olympia Postage Stanfield, Arron v. FA	1	2.10	2.10
62676 EXP 5/20/2020 WIP Odyssey - CMS	Olympia Court fees Stanfield, Arron v. FA	1	3.60	3.60
62782 EXP 6/8/2020 WIP Ortman Mediation	Olympia Arbitrators Stanfield, Arron v. FA	1	9000.00	9000.00
63513 EXP 6/26/2020 WIP Parking	Kristen Agnew Other travel Stanfield, Arron v. FA	1	38.50	38.50
63512 EXP 6/29/2020 WIP Parking	Kristen Agnew Other travel Stanfield, Arron v. FA	1	38.50	38.50
63407 EXP 7/27/2020 WIP Odyssey - Joint CMS	Olympia Court fees Stanfield, Arron v. FA	1	3.60	3.60
63408 EXP 7/28/2020 WIP Odyssey - CMS	Olympia Court fees Stanfield, Arron v. FA	1	3.60	3.60

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Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
64460	EXP	Olympia	1	3.60	3.60
10/19/2020		Court fees			
WIP		Stanfield, Arron v. FA			
Odyssey - CMS					
64589	EXP	Olympia	1	24.15	24.15
10/22/2020		Court fees			
WIP		Stanfield, Arron v. FA			
Odyssey - Joint Stip & Protective Order					
64659	EXP	Olympia	1	96.07	96.07
10/30/2020		Court fees			
WIP		Stanfield, Arron v. FA			
Odyssey - MPA					
64892	EXP	Olympia	1	6.90	6.90
10/31/2020		Postage			
WIP		Stanfield, Arron v. FA			
Postage					
65104	EXP	Olympia	1	3.60	3.60
11/30/2020		Court fees			
WIP		Stanfield, Arron v. FA			
Odyssey - Amended Ntc of MPA					
65808	EXP	Olympia	1	3.60	3.60
1/25/2021		Court fees			
WIP		Stanfield, Arron v. FA			
Odyssey - CMS					
66760	EXP	Olympia	1	239.51	239.51
3/3/2021		Atty Service			
WIP		Stanfield, Arron v. FA			
Attorney Service - Copy of Order					
66912	EXP	Erika Mejia	1	3.60	3.60
4/13/2021		Court fees			
WIP		Stanfield, Arron v. FA			
Odyssey - Notice of Entry of Order					
67077	EXP	Olympia	1	96.07	96.07
4/28/2021		Court fees			
WIP		Stanfield, Arron v. FA			
Odyssey - MFA					
67078	EXP	Olympia	1	239.51	239.51
4/28/2021		Atty Service			
WIP		Stanfield, Arron v. FA			
Attorney Service - MFA Order					

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
Grand Total				
	Billable	0.00		11465.67
	Unbillable	0.00		0.00
	Total	0.00		11465.67