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Attorneys for Plaintiff Smith, the Class, and Aggrieved Employees

[Additional counsel information on next page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

CLARENCE SMITH, as an individual and
on behalf of all others similarly situated,

Plaintiffs,

v.

WATLOW ELECTRIC
MANUFACTURING COMPANY, a
Missouri corporation; and DOES 1 through
50, inclusive,

Defendants.

~~PHUOC TRUONG, on behalf of himself
and all "aggrieved employees" pursuant to
Labor Code § 2698 et seq.,~~

~~Plaintiff,~~

~~v.~~

~~WATLOW ELECTRIC
MANUFACTURING COMPANY, a
Missouri corporation, and DOES 1 through
10, inclusive,~~

~~Defendants.~~

CASE NO. 20CV365250
Consolidated with Case No. 20CV362069

[Assigned for all purposes to the Hon. Sunil R.
Kulkarni, Dept. 1]

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

DATE: May 26, 2021
TIME: 1:30 P.M.
DEPT.: 1

Complaint filed: March 18, 2020
Trial Date: None

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20 Attorneys for Plaintiff Truong and Aggrieved Employees

DECLARATION OF LARRY W. LEE

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 Named Plaintiff Clarence Smith ("Plaintiff Smith"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I am one of the primary attorneys on this matter. My qualifications are as follows: I received my JD 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 was in law school, I was the Associate Managing Editor of the Arizona State University College of Law, Law Journal. For more than one and one-half years after graduating from law school, I practiced law as an associate at the Los Angeles County offices of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment defense law firm, representing Fortune 500 companies in employment matters, including wage and hour class actions.

3. 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 in 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 District Courts for the Central, Northern, and Eastern Districts of California. I have been named as Class Counsel in a number of class actions that have been granted final approval by the Superior Courts of Los Angeles County, Orange County, San Francisco County, and the United States District Court for the Central District of California, including the following Class Actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court Case No. JCCP 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No. BC392717; and *Hernandez v. CVS Corporation*, Los Angeles Superior Court Case No. JCCP 4539.

1 4. I have been approved as class counsel in numerous other wage/hour class actions
2 that have been granted class certification and final approval.

3 5. To date, I have incurred approximately 44.6 hours in connection with the litigation
4 of this lawsuit. Attached hereto as **Exhibit A** is a chart summarizing the amount of work I have
5 incurred to date on this matter.

6 6. In addition to the hours above, I also anticipate spending an additional 5 hours
7 through the completion of this case including conferring and reviewing e-mails and other written
8 communications with counsel for Defendant, the Settlement Administrator, and Class Members
9 regarding any post-final approval matters, including payments and related issues.

10 7. Thus, I anticipate the total amount of my fees incurred in this case to be
11 approximately \$37,200.00, based on 49.6 total hours, at an hourly rate of \$750.00 per hour. Since
12 at least 2018, I have been approved at an hourly rate of \$700.00 per hour by various Courts, in a
13 number of matters. As of 2020, I increased my hourly rate to \$750.00 per hour. I have been
14 approved at \$750.00 per hour by various courts, including: *Hernandez v. Wells Fargo Bank*, Santa
15 Clara County Superior Court Case No. 16CV299319, *Carrillo v. New Balance Athletics, Inc.*,
16 Santa Clara County Superior Court Case No. 19CV352469; *Ramirez v. Walgreen Co.*, United
17 States District Court, Northern District of California Case No. 18-cv-03921-EJD, *Chavez v.*
18 *Converse, Inc.*, United States District Court, Northern District of California Case No. 15-cv-
19 03746-NC; *Foster v. Schindler Elevator Corporation*, Alameda County Superior Court Case No.
20 RG19029640; *Foad Hanna v. Equinix, LLC*, Santa Clara County Superior Court Case No.
21 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles County Superior Court Case No.
22 BC720144; *Mary Della Maggiora v. Watsonville Community Hospital*, Santa Cruz County
23 Superior Court Case No. 18CV00191; *Pittman v. Martinez Steel Corporation*, San Bernardino
24 County Superior Court Case No. CIVDS1823132; *Michael Randolph v. Pacific Racing*
25 *Association*, Alameda County Superior Court Case No. RG18908139; *Markham v. Quik Stop*
26 *Markets, Inc.*, Santa Clara Superior Court Case No. 19CV341582; *Siron v. Raypak, Inc.*, Ventura
27 Superior Court Case No. 56-2019-005279959-CU-OE-VTA; *Carter v. Kline Services, Inc.*, San
28 Bernardino Superior Court Case No. CIVDS1828867, and *Prexxie Pascual and Arturo Fonseca v.*
Satellite Healthcare, Inc., Santa Clara Superior Court Case No. 19CV345211.

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

3 Executed on this 4th day of May, 2022, at Los Angeles, California.

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EXHIBIT A

Smith v. Watlow Electric
Larry W. Lee Time and Task Chart

Hours	Description of Work
2.2	Review client documents; confer with co counsel re theories of case; research potential causes of action and viability of same
3.1	Review and revise complaint and amended complaints and PAGA letter
1.1	Review initial court notices and complex guidelines
6.8	Review notice of related cases; research same; confer with counsel re same; review and revise stip to consolidate cases
2.6	Conferences with counsel re mediation and scheduling; review and revise class data request for mediation
4.8	Review payroll data produced by Defendant; review and revise class damages re same
2.7	Review and revise mediation brief; legal research re same
8.0	Attend mediation
4.1	Review and revise long form settlement documents; conferences with counsel re same
3.3	Review and revise Motion for Preliminary Approval and supporting documents
3.6	Review court ruling re prelim approval motion; review and revise amended settlement agreement and supplemental brief re motion for prelim approval
2.3	Review and revise Motion for Final Approval and supporting documents
44.6	TOTAL HOURS