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Attorneys for Plaintiff SHARI RILEY,
individually, and on behalf of other
members of the general public
similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - CENTRAL**

SHARI RILEY, individually, and on behalf of
other members of the general public similarly
situated;

Plaintiff,

v.

PRIMITIVE COMPANY, a California
corporation; and Jubal Jones, an individual;
Mitch Bhatia, an individual, Paul Rodriguez,
Jr., an individual; and DOES 1 through 50,
inclusive;

Defendants.

CASE NO. 20STCV07175

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

Date: March 28, 2022
Time: 9:00 a.m.
Dept.: 17

Assigned to the Hon. Maren E. Nelson
Dept 17

Complaint filed: 2/25/20
Trial date: None

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1 6. In 2015, I expanded my law practice to represent employees in employment-related
2 claims. In 2017, I transitioned my law practice to spend most of my time representing plaintiffs in
3 employment litigation. I have served as lead or co-counsel on all of my firm's cases in state and
4 federal courts in California. I have litigated my cases effectively as demonstrated by many
5 positive online reviews from satisfied Clients. I have relentlessly litigated my cases and collected
6 millions of dollars for my clients, including most recent settlements of \$500,000, \$350,000 and
7 \$250,000.

8 7. Since expanding my law practice to representing employees, I have served as lead
9 counsel and co-counsel on several wage and hour and PAGA actions before the Los Angeles
10 County Superior Court: *Kim v. Samho Tour, Inc.*, Los Angeles Superior Court, Case No.
11 19STCV14074, *Lowe v. Terminix*, Los Angeles Superior Court, Case No. 20STCV18623,
12 *Rosenberg v. Woodward HRT, Inc.*, Los Angeles Superior Court, Case No. 20STCV39415. In
13 addition, throughout my legal career, I have represented a number of individual plaintiffs in wage
14 and hour actions. Accordingly, I have substantial experience in California wage-and-hour
15 litigation and PAGA actions.

16 8. In 2016, I served as President of the *Korean American Bar Association of Southern*
17 *California*, the largest and oldest organization of its kind. During my term, we were awarded the
18 California State Bar President's Award for Distinguished Pro Bono Services. Since 1990, our
19 organization has provided pro-bono legal services to thousands of low-income residents of the Los
20 Angeles Koreatown area. I am a former multi-year member of the California Employment Lawyers
21 Association (CELA) and the Consumer Attorneys Association of Los Angeles (CAALA) and have
22 attended trial college, conferences, seminars and the annual CAALA convention. I have also been
23 previously selected as Super Lawyer-Rising Star multiple times.

24 **A. COSTS**

25 9. I have reviewed the costs in this case. I have spent a total of \$0 in prosecuting this
26 case. My co-counsel has expended all of the costs relating to the instant action.

1 **B. HOURLY RATE AND LODESTAR**

2 10. My hourly rate for this case is \$550.00. I believe this hourly rate to be justified in
3 light of my experience and the results I have achieved in the past, as detailed above.

4 11. It is my opinion, \$550.00 is a reasonable hourly rate in this case given my
5 experience, the complexity of the matter in litigation, and the rates for similarly experienced
6 principal attorneys in the Los Angeles area.

7 12. For the instant action, my total lodestar to date is \$14,740.00 (hours x \$550.00 per
8 hour), not including time spent compiling my time records. Attached as Exhibit H is a true and
9 correct copy of my billing records on this matter. I anticipate having to spend an additional 10 to
10 20 hours on this case handling class member issues and finalizing the class action settlement,
11 including the motion for final approval.

12 13. I have performed the following work on this case, including, among other things:
13 (1) interviewing Plaintiff about her experience working for Defendants; (2) drafting pleadings; (3)
14 drafting meet and confer letters; (4) drafting the mediation brief; (5) preparing for and attending
15 mediation; (6) negotiating, drafting, and executing all settlement documents, including, among
16 other documents, the memorandum of understanding, joint stipulation for class action settlement,
17 and motion for preliminary approval; and (7) keeping Plaintiff informed about all developments in
18 the case, and preparing and assisting them in the prosecution of their claims for unpaid wages and
19 damages relating to other labor code violations.

20 **C. FEE SPLIT WITH CO-COUNSEL**

21 14. The attorneys' fees in this case are being shared by and between the Law Offices of
22 Lloyd Lee and Lim Law Group, P.C. on a 50/50 fee split basis.

23 **D. CONTINGENCY NATURE OF RECOVERY**

24 15. This class action was filed nearly three years ago, and for Class Counsel, the fees
25 were wholly contingent in nature, and Class Counsel's attention to this difficult case was
26 undertaken in lieu of work on other cases. I have not been paid to date on this case and will only
27 receive payment if the settlement is approved.
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16. This case carried a high degree risk of no recovery on my part, or the part of my firm, that no fees would ever be recovered, including a possible chance of loss at trial and, if we won at trial, the chance of non-collectability of any judgment, especially given Defendant's recent bankruptcy filings, which have been resolved and concluded.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that I executed this declaration on March 3, 2022, at Los Angeles, California.

/s/ Lloyd Lee
Lloyd Lee

EXHIBIT H

Exhibit A

Date	Hours	Description
1/21/2020	0.8	Client Communication
1/24/2020	2.5	Client Meeting in Office
1/25/2020	0.5	Document Review
1/25/2020	1.0	Case Analysis and Due Diligence
1/25/2020	0.5	Client Communication
1/28/2020	0.1	Client Communication
1/29/2020	0.1	Client Communication
2/3/2020	0.1	Client Communication
2/3/2020	0.5	Document Review
2/13/2020	0.5	Review Complaint
2/18/2020	0.1	Client Communication
2/19/2020	0.1	Client Communication
2/3/2020	0.3	Client Communication
2/3/2020	0.2	Review PAGA Letter
2/24/2020	0.1	Client Communication
4/30/2020	0.1	Review Attorney Communication re Joint Statement for Status Conference
5/14/2020	0.1	Client Communication
5/14/2020	0.1	Review Attorney Communication re Mediation
5/18/2020	0.1	Review Attorney Communication re Discovery and Production
5/27/2020	0.1	Review Attorney Communication re Discovery and Production
6/1/2020	0.1	Review Attorney Communication re Discovery and Production
6/1/2020	0.2	Client Communication
6/18/2020	0.1	Client Communication
6/22/2020	0.1	Review Attorney Communication re Mediation
6/22/2020	0.5	Client Communication
6/23/2020	0.1	Review Attorney Communication re Mediation
6/24/2020	0.1	Review Attorney Communication re Mediation
6/30/2020	0.1	Review Attorney Communication re Discovery and Mediation
7/1/2020	0.2	Client Communication
7/1/2020	0.1	Review Attorney Communication re Conference Call
7/9/2020	0.1	Review Attorney Communication re Conference Call
7/9/2020	0.3	Conference Call - Opposing Counsel
7/21/2020	0.1	Client Communication
7/22/2020	0.1	Review Attorney Communication re Discovery Documents
8/1/2020	0.1	Client Communication
8/5/2020	0.1	Review Attorney Communication re Discovery Documents
8/17/2020	0.1	Review Attorney Communication re Discovery Documents
8/28/2020	0.1	Review Attorney Communication re JSC Statement
8/29/2020	0.1	Review Attorney Communication re Settlement
8/31/2020	0.2	Review Attorney Communication re Settlement
9/1/2020	0.1	Client Communication
9/1/2020	0.1	Review Attorney Communication re Settlement
9/4/2020	0.1	Review Attorney Communication re Settlement
9/14/2020	0.1	Review Attorney Communication re Discovery Documents
9/15/2020	0.1	Review Attorney Communication re Discovery Documents
9/29/2020	0.1	Review Attorney Communication re Discovery Documents

10/1/2020	0.2 Client Communication
10/15/2020	0.1 Review Attorney Communication re JSC Statement
10/16/2020	0.1 Review Attorney Communication re Status Report
10/23/2020	0.1 Review Attorney Communication re Discovery Documents
10/29/2020	0.2 Review Notice of Ruling
10/29/2020	0.3 Review Amended Complaint
11/1/2020	0.2 Client Communication
11/3/2020	2.5 Review Document Production
11/5/2020	0.2 Client Communication
11/6/2020	0.1 Review Attorney Communication re Mediation
11/10/2020	0.1 Review Attorney Communication re Mediation
11/12/2020	2.0 Preparation for Mediation; Discuss Damages with Co-Counsel
11/12/2020	0.1 Review Attorney Communication re Mediation
11/13/2020	0.1 Review Attorney Communication re Mediation
11/16/2020	0.1 Review Attorney Communication re Mediation
11/23/2020	1.0 Revise Mediation Brief
11/30/2020	7.0 Mediation
5/28/2021	0.5 Review Settlement Agreement
6/3/2021	0.5 Review Preliminary Motion for Approval

Total Hours	26.8
Hourly Rate	550.0
Total Bill	\$ 14,740.00