

JAMES HAWKINS APLC
James R. Hawkins, Esq. (#192925)
Gregory Mauro, Esq. (#222239)
Michael Calvo, Esq. (#314986)
Lauren Falk, Esq. (#316893)
Ava Issary, Esq. (#342252)
9880 Research Drive, Suite 200
Irvine, CA 92618
Tel.: (949) 387-7200
Fax: (949) 387-6676
Email: James@jameshawkinsaplc.com
Email: Greg@jameshawkinsaplc.com
Email: Michael@jameshawkinsaplc.com
Email: Lauren@jameshawkinsaplc.com
Email: Ava@jameshawkinsaplc.com

Attorneys for Plaintiff JOSE DE LA TORRE,
individually and on behalf of all others similarly situated

(ADDITIONAL COUNSEL ON NEXT PAGE)

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

JOSE DE LA TORRE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

WASTE MANAGEMENT OF
CALIFORNIA, INC., a California
Corporation, WASTE MANAGEMENT,
INC., a Texas Corporation, and DOES 1-50,
inclusive,

Defendants.

Case No. 20STCV16032

ASSIGNED FOR ALL PURPOSES TO
JUDGE: ELIHU M. BERLE, DEPT. 6

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

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3 **ADDITIONAL COUNSEL**

4 Larry W. Lee (State Bar No. 228175)
5 **DIVERSITY LAW GROUP, P.C.**
6 515 S. Figueroa St., Suite 1250
7 Los Angeles, California 90071
8 (213) 488-6555
9 (213) 488-6554 facsimile
10 lwlee@diversitylaw.com

11 Edward W. Choi, Esq. SBN 211334
12 **LAW OFFICES OF CHOI & ASSOCIATES**
13 515 S. Figueroa St., Suite 1250
14 Los Angeles, CA 90071
15 Telephone: (213) 381-1515
16 Facsimile: (213) 465-4885
17 Email: edward.choi@choiandassociates.com

18 William L. Marder (SBN 170131)
19 bill@polarislawgroup.com
20 **POLARIS LAW GROUP**
21 501 San Benito Street, Suite 200
22 Hollister, CA 95023
23 Telephone: (831) 531-4214
24 Facsimile: (831) 634-0333

25 Edward W. Choi, Esq. SBN 211334
26 edward.choi@choiandassociates.com
27 **LAW OFFICES OF CHOI & ASSOCIATES**
28 515 S. Figueroa St., Suite 1250
Los Angeles, CA 90071
Telephone: (213) 381-1515
Facsimile: (213) 465-4885

Attorneys for Plaintiffs

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1 *Home Loans et al.*, Orange County Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central
2 District of California Case No. CV 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*,
3 Orange County Superior Court Case No. JCCP 4480; *Tse v. Best Buy*, Los Angeles Superior Court
4 Case No. BC392717; and *Hernandez v. CVS Corporation*, Los Angeles Superior Court Case No.
5 JCCP 4539.

6 6. On October 11, 2022, Arellano filed a putative class action for violation of Labor
7 Code § 226(a)(2) against Defendant in the Shasta County Superior Court, Case No. 200801 (the
8 “Arellano Class Action”). The Arellano Class Action asserted that Defendant violated Section
9 226(a)(2) by listing inaccurate total hours worked on wage statements whenever Defendant paid
10 overtime wages. On December 9, 2022, Defendant removed the Arellano Class Action to the U.S.
11 District Court for the Eastern District of California.

12 7. On December 9, 2022, Arellano filed a representative action pursuant to the Private
13 Attorneys General Act (the “PAGA”) against Defendant in the Shasta County Superior Court, Case
14 No. 201225 (the “Arellano PAGA Action”). The *Arellano* PAGA Action is also premised on
15 Defendant’s failure to list the accurate total hours worked on wage statements in violation of Labor
16 Code § 226(a)(2) relating to the same overtime issue.

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

19 Executed on this February 27, 2025, at Los Angeles, California.

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