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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.

USA WASTE OF CALIFORNIA, 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**

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Attorneys for Plaintiffs

1 **DECLARATION OF LARRY W. LEE**

2 I, Larry W. Lee, declare as follows:

3 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
4 California, and am with the law firm Diversity Law Group, counsel of record for Named Plaintiff
5 LORI ARELLANO ("Plaintiff"). I have personal knowledge of the facts set forth below and if called
6 to testify I could and would do so competently.

7 2. From the inception of the case, Plaintiff's Counsel have zealously represented the
8 interests of Plaintiff and the class members. The settlement was obtained for the benefit of the class,
9 as opposed to the individual Plaintiff. Based on my review of all the information, and based on my
10 experience in wage and hour litigation, I believe this settlement to be fair, adequate, and reasonable.

11 3. My qualifications are as follows: I received my J.D. from Arizona State University
12 College of Law in 2003. During law school, I was a summer associate at the law firm of Brobeck,
13 Phleger & Harrison. I graduated cum laude from Arizona State University College of Law in the top
14 10% of my class. While I was in law school, I was the Associate Managing Editor of the Arizona
15 State University College of Law, Law Journal. Upon graduation, I practiced law as an associate at the
16 Los Angeles County offices of Ogletree Deakins Nash Smoak & Stewart, P.C., a national
17 employment defense law firm that represents a significant number of Fortune 500 companies.

18 4. My primary practice is employment law. I have handled a number of wage and hour
19 matters including class actions and individual actions, on both plaintiff and defense sides. I have a
20 practice that encompasses cases throughout the State of California, including but not limited to the
21 Los Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County
22 Superior Courts, the San Diego County Superior Courts, and the United States District Courts for the
23 Central, Eastern, Northern, and Southern Districts of California.

24 5. I have been named as Class Counsel in a number of class actions that have been
25 granted final approval by the Superior Courts of Los Angeles County, Orange County, San Francisco
26 County, Alameda County, Contra Costa County, Monterey County, San Bernardino County, Santa
27 Clara County, Sonoma County, and the United States District Court for the Central, Eastern, and
28 Northern Districts of California, including but not limited to the following class actions: *Chan Lanier*
v. Citigroup, Inc. et al., San Francisco Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic*

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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