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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO**

GUY BLAZ HANLEY, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

vs.

SAMSARA NETWORKS, INC., a
Delaware corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: CGC-20-584034

[Assigned to the Hon. Anne-Christine Massullo,
Dept. 304]

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF PLAINTIFF'S MOTION TO
APPROVE SETTLEMENT AGREEMENT
PURSUANT TO THE PRIVATE
ATTORNEYS GENERAL ACT**

Date: January 4, 2022

Time: 10:00 a.m.

Dept.: 304

Complaint Filed: April 3, 2020

Trial Date: None Set

ELECTRONICALLY
FILED

*Superior Court of California,
County of San Francisco*

12/09/2021
Clerk of the Court
BY: SANDRA SCHIRO

Deputy Clerk

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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, P.C., counsel of record for Plaintiff Guy Blaz Hanley (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. From the inception of the case, Plaintiff's Counsel has zealously represented the interests of Plaintiff and the aggrieved employees.

3. I strongly believe that Plaintiff can prevail at trial. However, I also believe in the fairness of the settlement. After taking into account sharply disputed factual and legal issues involved in this litigation, the risks attending further prosecution, and the substantial benefits to be received pursuant to the compromise and settlement of the litigation, I have concluded that settlement on the terms set forth in the PAGA Settlement Agreement (“Settlement Agreement”) is appropriate and in the best interests of Plaintiff and the aggrieved employees.

4. 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.

5. For more than one and a half years 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 that represents a significant number of Fortune 50 companies, including many actions involving wage and hour matters.

6. 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

District Courts for the Central, Eastern, Northern, and Southern 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, Alameda County, Contra Costa County, Monterey County, San Bernardino County, Santa Clara County, Sonoma County, and the United States District Court for the Central, Eastern, and 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 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.

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

8. To date, I have incurred approximately 58.8 hours in connection with the litigation of this lawsuit. Attached hereto as **Exhibit A** is a summary of the hours I have incurred to date.

9. I also anticipate spending an additional 15 hours attending the approval motion, conferring and reviewing e-mails and other written communications with counsel for Defendant, the Settlement Administrator, and employees regarding post final approval matters, including payments and related issues.

10. The total lodestar for my hours will be approximately \$55,350.00 based on an hourly rate of \$750.00 per hour. Since at least 2018, I have been approved at an hourly rate of \$700.00 per hour by various Courts, in a number of matters, including *Stafford v. Brinks et al.*, Los Angeles County Superior Court Case No. BC532260; *Chavez v. Kenneth Cole Productions, Inc.*, Santa Clara Superior Court Case No. 17CV306407; *Chavez v. Adidas*, U.S. District Court for the Northern District of California Case No. 5:16-cv-06533-LHK; *Mankin v. Taste Catering*, San Mateo Superior Court Case No. 17-CIV-03497; *Ricardo Macias v. SASCO*, Santa Clara

County Superior Court Case No. 16CV304263; *Valles v. Community Hospital of the Monterey Peninsula*, Monterey Superior Court Case No. 17CV003452; *Diaz v. WeDriveU*, Santa Clara Superior Court Case No. 17CV306547; *Sanchez v. American Para Professional Systems, Inc.*, Santa Clara County Superior Court Case No. 17CV306751; *Hernandez v Pei Wei*, United States District Court, Central District of California Case No. 8:17-cv-00679-JLS-JCG; *Song v. THC-Orange County, Inc.*, U.S. District Court for the Central District of California Case No. 8:17-cv00965-JLS-DFMx; *Perez v. Standard Drywall, Inc.*, Alameda County Superior Court Case No. RG15761142; *Huertas v. Chevron Stations*, Santa Clara Superior Court Case No. 17CV309996; and *In re DirecTv Wage and Hour Cases*, JCCP Case No. 4850.

11. As of 2020, I increased my hourly rate to \$750.00 per hour. I have been approved at \$750.00 per hour by various courts, including: *Hernandez v. Wells Fargo Bank*, Santa Clara County Superior Court Case No. 16CV299319, *Carrillo v. New Balance Athletics, Inc.*, Santa Clara County Superior Court Case No. 19CV352469; *Ramirez v. Walgreen Co.*, United States District Court, Northern District of California Case No. 18-cv-03921-EJD, *Chavez v. Converse, Inc.*, United States District Court, Northern District of California Case No. 15-cv-03746-NC; *Foster v. Schindler Elevator Corporation*, Alameda County Superior Court Case No. RG19029640; *Foadad Hanna v. Equinix, LLC*, Santa Clara County Superior Court Case No. 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles County Superior Court Case No. BC720144; *Mary Della Maggiora v. Watsonville Community Hospital*, Santa Cruz County Superior Court Case No. 18CV00191; *Pittman v. Martinez Steel Corporation*, San Bernardino County Superior Court Case No. CIVDS1823132; *Michael Randolph v. Pacific Racing Association*, Alameda County Superior Court Case No. RG18908139; *Markham v. Quik Stop Markets, Inc.*, Santa Clara Superior Court Case No. 19CV341582; *Siron v. Raypak, Inc.*, Ventura Superior Court Case No. 56-2019-005279959-CU-OE-VTA; *Carter v. Kline Services, Inc.*, San Bernardino Superior Court Case No. CIVDS1828867, and *Prexxie Pascual and Arturo Fonseca v. Satellite Healthcare, Inc.*, Santa Clara Superior Court Case No. 19CV345211.

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

Executed on December 9, 2021, at Los Angeles, California.



Larry W. Lee

EXHIBIT A

Peck-Hanley v Samsara
Larry W. Lee Time and Task Chart

Hours	Description of Work
5.8	Review client documents and research Defendant's background and prior litigation history; confer with co counsel re same
3.6	Review and revise PAGA letter; review and revise complaints
9.3	Review motion to compel arbitration; review and revise opposition to same; review reply to same; legal research re same
1.6	Review and revise joint cmc statements; confer with counsel re same
2.2	Meet and confer with counsel re dismissal of class/individual claims
.8	Confer with counsel re mediation and mediation data
5.3	Review documents produced by Defendant
16.6	Review and revise mediation brief; analyze data and calculate damages for same; attend mediation
6.8	Post mediation discussions with mediator and counsel re settlement terms
4.7	Review and revise settlement agreement; confer with counsel re same
2.1	Review and revise Motion for Approval and supporting documents
58.8	TOTAL HOURS