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Attorneys for Plaintiff James Sims,
the Class, and Aggrieved Employees

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JAMES SIMS, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

QG PRINTING II LLC, a Connecticut
limited liability company; 74 QG
PRINTING II LLC, business
organization, form unknown; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 5:20-cv-01632-DMG-DTBx

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

Date: April 19, 2024

Time: 10:00 A.M.

Courtroom: 8C

Judge: Hon. Dolly M. Gee

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I, Larry W. Lee, declare as follows:

1. I am an attorney at law duly admitted to practice before all courts in the State of California and am a member of the law firm, Diversity Law Group, one of the attorneys of record for Plaintiff James Sims (“Plaintiff”), on behalf of himself and other similarly situated individuals, in the above-entitled action. I have personal knowledge of the matters set forth herein, and if called upon as a witness to testify thereto, I could and would competently do so.

2. Plaintiff's counsel vigorously litigated this Action since the commencement of the Action, including obtaining class certification and contesting appellate review of the class certification order in the Ninth Circuit. Thus, Plaintiff's counsel took on substantial risk in litigating the Action and achieved a fair, reasonable, and adequate settlement for the Class.

3. 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 Settlement Agreement is appropriate and in the best interests of the Parties and that this settlement is fair and reasonable. The lack of opt outs and objections support that the settlement is fair and reasonable.

4. From the inception of the case, Plaintiff's counsel has zealously represented the interests of the putative class. The settlement was obtained for the benefit of the putative class, as opposed to the individual Plaintiff.

5. Each side has apprised the other of their respective factual contentions, legal theories and defenses, resulting in extensive arm's-length negotiations taking place among the Parties, including two sessions of mediation. Based on their own independent investigation and evaluation, the Parties and their respective counsel are of the opinion that the proposed settlement is fair, reasonable, and adequate and the settlement is in the best interests of the Class and Defendant in light of all known circumstances

1 and the expenses and risks inherent in litigation.

2 **ATTORNEY QUALIFICATIONS**

3 6. I am one of the primary attorneys on this matter. My qualifications are as
4 follows: I received my JD from Arizona State University College of Law in 2003. During
5 law school, I was a summer associate at the law firm of Brobeck, Phleger & Harrison. I
6 graduated *cum laude* from Arizona State University College of Law in the top 10% of my
7 class. While I was in law school, I was the Associate Managing Editor of the Arizona
8 State University College of Law, Law Journal. Upon graduation, I practiced law as an
9 associate at the Los Angeles County offices of Ogletree, Deakins, Nash, Smoak &
10 Stewart, P.C., a national employment defense law firm that represents a significant
11 number of Fortune 50 companies, including many actions involving wage and hour
12 matters.

13 7. My firm's primary focus is employment law. I have handled a number of
14 wage and hour matters including class actions and multiple-plaintiff actions. I have a
15 practice that encompasses cases throughout the State of California, including but not
16 limited to the Los Angeles Superior Courts, the Orange County Superior Courts, the San
17 Francisco County Superior Courts, the San Diego County Superior Courts, and the
18 United States District Courts for the Central, Eastern, Northern, and Southern Districts of
19 California.

20 8. I have been approved as class counsel in a number of class actions that have
21 been granted final approval by the Superior Courts of Los Angeles County, Orange
22 County, San Francisco County, Alameda County, Contra Costa County, Monterey
23 County, San Bernardino County, Santa Clara County, Sonoma County, and other
24 counties, as well as the United States District Court for the Central, Eastern, and Northern
25 Districts of California, including but not limited to the following class actions:

26 *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court Case No. CGC-05-
27 445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior Court Case No.
28 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-0196-RSWL

(PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court, Judicial Council Coordination Proceeding No. 4480; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination Proceeding No. 4539; *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-00182; *Valles v. Community Hospital of the Monterey Peninsula*, Monterey County Superior Court Case No. 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior Court Judicial Council Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*, Alameda County Superior Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*, Yolo County Superior Court Case No. CV-18-558.

9. In addition, I was certified as class counsel by the United States District Court, Central District of California in the case of *Abdullah v. U.S. Security* (Case Number CV 09-09554 GHK); *Avilez v. Pinkerton Government Services, Inc.* (Case Number SACV 11-0493-DOC); *Dynabursky v. Allied Barton Security Services* (Case Number SACV 12-02210 JST); and *Pace v. Petsmart, Inc.* (Case Number SACV 13-500-DOC); by the Northern District of California in the cases of *Harris v. Vector Marketing Corp.* (Case Number CV 08 5198 EMC) and *Lemus et al. v. H&R Block Enterprises, LLC* (Case Number CV-09-03179-SI); and by the Superior Court of California, Orange County in the cases of *De la Cruz v. Abercrombie & Fitch Co. et al.* (Case Number 30-2007-00036240) and *Wu v. General Nutrition Corporation* (Case Number 30-2012-00593759), all as part of the Courts' orders granting class certification pursuant to Rule 23 of the FRCP and California Code of Civil Procedure § 382.

10. I have no conflicts with the Class and will adequately represent the Class.

I declare under penalty of perjury and the laws of the United States of America and the State of California that the foregoing is true and correct and that this declaration was executed on this 5th day of April 2024, at Los Angeles, California.

/s/ Larry W. Lee
Larry W. Lee