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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-KK

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

Date: December 15, 2023

Time: 9:30 A.M.

Courtroom: 8C

Judge: Hon. Dolly M. Gee

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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 I competently do so.

3. Based on our independent investigations and evaluations, we are of the opinion that settlement for the consideration and on the terms set forth in the Joint Stipulation of Class Action Settlement is fair, reasonable, and adequate and is in the best interests of Plaintiff, the Class, and Defendant QG Printing II, LLC (“Defendant”), in light of all known facts and circumstances and the expenses and risks inherent in litigation.

the primary attorneys on this matter. My qualifications are as
from Arizona State University College of Law in 2003. During
er associate at the law firm of Brobeck, Phleger & Harrison. I
a Arizona State University College of Law in the top 10% of my
school, I was the Associate Managing Editor of the Arizona

1 State University College of Law, Law Journal. Upon graduation, I practiced law as an
2 associate at the Los Angeles County offices of Ogletree, Deakins, Nash, Smoak &
3 Stewart, P.C., a national employment defense law firm that represents a significant
4 number of Fortune 50 companies, including many actions involving wage and hour
5 matters.

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

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

19 *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court Case No. CGC-05-
20 445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior Court Case No.
21 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-0196-RSWL
22 (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court, Judicial
23 Council Coordination Proceeding No. 4480; *Hernandez v. CVS Corp. et al.*, Judicial
24 Council Coordination Proceeding No. 4539; *Padilla v. Safeway*, San Benito County
25 Superior Court Case No. CU-16-00182; *Valles v. Community Hospital of the Monterey*
26 *Peninsula*, Monterey County Superior Court Case No. 17CV003452; *DirecTv Wage and*
27 *Hour Cases*, Santa Clara Superior Court Judicial Council Coordination Proceeding No.
28 4850; *Perez v. Standard Drywall, Inc.*, Alameda County Superior Court Case No.

1 RG15761142; and *Davis v. Nugget Market, Inc.*, Yolo County Superior Court Case No.
2 CV-18-558.

3 7. In addition, I was certified as class counsel by the United States District
4 Court, Central District of California in the case of *Abdullah v. U.S. Security* (Case
5 Number CV 09-09554 GHK); *Avilez v. Pinkerton Government Services, Inc.* (Case
6 Number SACV 11-0493-DOC); *Dynabursky v. Allied Barton Security Services* (Case
7 Number SACV 12-02210 JST); and *Pace v. Petsmart, Inc.* (Case Number SACV 13-500-
8 DOC); by the Northern District of California in the cases of *Harris v. Vector Marketing*
9 *Corp.* (Case Number CV 08 5198 EMC) and *Lemus et al. v. H&R Block Enterprises,*
10 *LLC* (Case Number CV-09-03179-SI); and by the Superior Court of California, Orange
11 County in the cases of *De la Cruz v. Abercrombie & Fitch Co. et al.* (Case Number 30-
12 2007-00036240) and *Wu v. General Nutrition Corporation* (Case Number 30-2012-
13 00593759), all as part of the Courts' orders granting class certification pursuant to Rule
14 23 of the FRCP and California Code of Civil Procedure § 382.

15 8. My only relationship with Plaintiff is the attorney-client relationship in this
16 matter.

17 9. I do not have any relationship with Legal Aid Association of California.

18 I declare under penalty of perjury and the laws of the United States of America and
19 the State of California that the foregoing is true and correct and that this declaration was
20 executed on this 9th day of November 2023, at Los Angeles, California.

21 /s/ Larry W. Lee

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