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11 Attorneys for Plaintiff,
KARYN MONDO, on behalf of herself
and all similarly aggrieved employees
12

13 **SUPERIOR COURT OF CALIFORNIA**

14 **COUNTY OF MONTEREY**

15 KARYN MONDO, on behalf of herself
and all similarly aggrieved employees,

16 Plaintiff,

17 v.

18 THE PAPE' GROUP, INC.; PAPE'
MATERIAL HANDLING, INC.; and DOES 1
19 through 50, inclusive,

20 Defendants.
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Case No. 20CV001665

(Assigned to the Honorable Robert O'Farrell,
Dept. 13)

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

Date: August 24, 2021

Time: 9:00 a.m.

Dept.: 13

Complaint Filed: June 16, 2020

FAC Filed: April 20, 2021

1 limited to the Los Angeles Superior Courts, the Orange County Superior Courts, the San
2 Francisco County Superior Courts, the San Diego County Superior Courts, and the United
3 States District Courts for the Central, Eastern, Northern, and Southern Districts of California.

4 7. I have been named as Class Counsel in a number of class actions that have been
5 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
6 Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino
7 County, Santa Clara County, Sonoma County, and the United States District Court for the
8 Central, Eastern, and Northern Districts of California, including but not limited to the
9 following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court
10 Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior
11 Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-
12 0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court
13 Case No. JCCP 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No. BC392717; and
14 *Hernandez v. CVS Corporation*, Los Angeles Superior Court Case No. JCCP 4539.

15 8. To date, I have incurred approximately 42.4 hours in connection with the
16 litigation of this lawsuit. Attached hereto as **Exhibit A** is a chart summarizing the amount of
17 work I have incurred to date on this matter.

18 9. In addition to the hours above, I also anticipate spending an additional 10 hours
19 through the completion of this case including preparing and attending the approval hearing,
20 conferring and reviewing e-mails and other written communications with counsel for
21 Defendants, communicating with the Settlement Administrator regarding any post-approval
22 matters, including payments and related issues.

23 10. The total lodestar for my hours will be approximately \$39,300.00 based on an
24 hourly rate of \$750.00 per hour. Since at least 2018, I have been approved at an hourly rate of
25 \$700.00 per hour by various Courts, in a number of matters, including *Stafford v. Brinks et al.*,
26 Los Angeles County Superior Court Case No. BC532260; *Chavez v. Kenneth Cole*
27 *Productions, Inc.*, Santa Clara Superior Court Case No. 17CV306407; *Chavez v. Adidas, U.S.*
28 *District Court for the Northern District of California* Case No. 5:16-cv-06533-LHK; *Mankin v.*

1 Taste Catering, San Mateo Superior Court Case No. 17-CIV-03497; Ricardo Macias v.
2 SASCO, Santa Clara County Superior Court Case No. 16CV304263; Valles v. Community
3 Hospital of the Monterey Peninsula, Monterey Superior Court Case No. 17CV003452; Diaz v.
4 WeDriveU, Santa Clara Superior Court Case No. 17CV306547; Sanchez v. American Para
5 Professional Systems, Inc., Santa Clara County Superior Court Case No. 17CV306751;
6 Hernandez v Pei Wei, United States District Court, Central District of California Case No.
7 8:17-cv-00679-JLS-JCG; Song v. THC-Orange County, Inc., U.S. District Court for the
8 Central District of California Case No. 8:17-cv00965-JLS-DFMx; Perez v. Standard Drywall,
9 Inc., Alameda County Superior Court Case No. RG15761142; Huertas v. Chevron Stations,
10 Santa Clara Superior Court Case No. 17CV309996; and In re DirecTv Wage and Hour Cases,
11 JCCP Case No. 4850. As of 2020, I increased my hourly rate to \$750.00 per hour. I have been
12 approved at \$750.00 per hour by the Santa Clara County Superior Court in Hernandez v. Wells
13 Fargo Bank, Case No. 16CV299319 and Carrillo v. New Balance Athletics, Inc., Case No.
14 19CV352469; the United States District Court, Northern District of California in Ramirez v.
15 Walgreen Co., Case No. 18-cv-03921-EJD and in Chavez v. Converse, Inc., Case No. 15-cv-
16 03746-NC; and the Alameda Superior Court in Foster v. Schindler Elevator Corporation, Case
17 No. RG19029640.

18 11. To date, my office has incurred \$6799.55 in actual costs. The costs are all
19 litigation-related costs, including filing fees, Court Call fees, mediation fees, postage, and
20 service fees. Attached hereto as **Exhibit B** is a copy of costs my firm has incurred in
21 connection with the prosecution of this lawsuit.

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

24 Executed on this 2nd day of August 2021, at Los Angeles, California.

25 /s/ Larry W. Lee
26 Larry W. Lee
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EXHIBIT A

Mondo v. The Pape' Group
Larry W. Lee Time and Task Chart

Hours	Description of Work
3.8	Review client documents and research Defendant's background and prior litigation history
3.6	Review and revise PAGA letter; review and revise complaints
1.6	Review and revise joint cmc statements; confer with counsel re same
4.1	Review Defendant's discovery requests to Plaintiff; confer with counsel re responses to same
.8	Confer with counsel re mediation and mediation data
5.3	Review documents produced by Defendant
11.6	Review and revise mediation brief; analyze data and calculate damages for same; attend mediation
5.8	Post mediation discussions with mediator and counsel re settlement terms
3.7	Review and revise settlement agreement; confer with counsel re same
2.1	Review and revise Motion for Approval and supporting documents
42.4	TOTAL HOURS

EXHIBIT B

7/21/2021
2:52 PM

DIVERSITY LAW GROUP
Slip Listing

Page 1

Selection Criteria

Slip.Classification Open
Client (hand select) Include: Mondo, Karyn v. The Pape
Slip.Transaction Ty 2 - 2

Rate Info - identifies rate source and level

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
64416	EXP	Olympia	1	3.60	3.60
10/13/2020		Court fees			
WIP		Mondo, Karyn v. The Pape			
Odyssey - Joint CMS					
64488	EXP	Larry W. Lee	1	94.00	94.00
10/20/2020		Court fees			
WIP		Mondo, Karyn v. The Pape			
Courtcall					
65819	EXP	Olympia	1	3.60	3.60
1/26/2021		Court fees			
WIP		Mondo, Karyn v. The Pape			
Odyssey - Joing CMS					
65844	EXP	Mai Tulyathan	1	94.00	94.00
2/2/2021		Court fees			
WIP		Mondo, Karyn v. The Pape			
Courtcall					
66272	EXP	Olympia	1	6450.00	6450.00
2/24/2021		Arbitrators			
WIP		Mondo, Karyn v. The Pape			
JAMS Mediation					
67938	EXP	Olympia	1	49.55	49.55
3/13/2021		Delivery serv			
WIP		Mondo, Karyn v. The Pape			
Federal Express					
66916	EXP	Erika Mejia	1	3.60	3.60
4/13/2021		Court fees			
WIP		Mondo, Karyn v. The Pape			
Odyssey - Joint CMS					
66917	EXP	Erika Mejia	1	3.60	3.60
4/13/2021		Court fees			
WIP		Mondo, Karyn v. The Pape			
Odyssey - Joint Stip & Proposed Order to file FAC					

7/21/2021
2:52 PM

DIVERSITY LAW GROUP
Slip Listing

Page 2

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
66938	EXP	Larry W. Lee	1	94.00	94.00
4/20/2021		Court fees			
WIP		Mondo, Karyn v. The Pape			
Courtcall					
66965	EXP	Erika Mejia	1	3.60	3.60
4/21/2021		Court fees			
WIP		Mondo, Karyn v. The Pape			
Odyssey - Notice of Entry of Order					
Grand Total					
			0.00		6799.55
			0.00		0.00
			0.00		6799.55