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Attorneys for Plaintiff and the Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

MENCHILA VILLARUBIA WOODALL,
as an individual and on behalf of all others
similarly situated,

Plaintiffs,

vs.

VASONA MANAGEMENT, INC., an
California corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 20CV366143

(Assigned to the Honorable Patricia M. Lucas,
Dept. 3)

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

Date: September 1, 2021

Time: 1:30 p.m.

Dept.: 3

Complaint Filed: April 20, 2020

FAC Filed: July 16, 2020

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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, counsel of record for Named Plaintiff Menchila Villarubia Woodall (“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 have zealously represented the interests of Plaintiff and the aggrieved employees. The settlement was obtained for the benefit of the aggrieved employees, as opposed to the individual Plaintiff.

3. I strongly believe that Plaintiff can prevail at trial. However, I also believe in the fairness of the settlement, which is based on factoring in the inherent risks in drawn-out litigation, as well as the possibility of appeals.

4. 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 Joint Stipulation of Settlement and Release Under the Private Attorneys General Act (the “Settlement Agreement” or “Settlement”) is appropriate and in the best interests of Plaintiff and the aggrieved employees.

5. My qualifications are as follows: I received my J.D. 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. Upon graduation, 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 500 companies.

6. My firm's primary focus is employment law. I have handled a number of wage and hour matters including class actions and multiple-plaintiff actions. I have a practice that

encompasses cases in the Los Angeles Superior Courts, the Orange County Superior Courts, the Sacramento County Superior Courts, the Alameda County Superior Courts, the San Diego County Superior Courts, and the United States District Courts for the Central, Eastern and Northern Districts of California.

7. 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, Alameda County and the United States District Court for the Central District of California, including 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, Judicial Council Coordination Proceeding No. 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No. BC392717; and *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination Proceeding No. 4539.

8. To date, I have incurred approximately 15.1 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. The total lodestar for my hours will be approximately \$11,325 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. Adidas*, U.S. District Court for the Northern District of California Case No. 5:16-cv-06533-LHK; *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; and *Hernandez v. Pei Wei*, United States District Court, Central District of California Case No. 8:17-cv-00679-JLS-JCG. As of 2019, I increased my hourly rate to \$750.00 per hour. I have been approved at this rate by various courts, including: *Foaad Hanna v. Equinix, LLC*, Santa Clara County Superior Court Case No. 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles County Superior Court

1 Case No. BC720144; *Mary Della Maggiora v. Watsonville Community Hospital*, Santa Cruz
2 County Superior Court Case No. 18CV00191; *Pittman v. Martinez Steel Corporation*, San
3 Bernardino County Superior Court Case No. CIVDS1823132; *Michael Randolph v. Pacific*
4 *Racing Association*, Alameda County Superior Court Case No. RG18908139; *Markham v. Quik*
5 *Stop Markets, Inc.*, Santa Clara Superior Court Case No. 19CV341582; *Siron v. Raypak, Inc.*,
6 Ventura Superior Court Case No. 56-2019-005279959-CU-OE-VTA; *Carter v. Kline Services,*
7 *Inc.*, San Bernardino Superior Court Case No. CIVDS1828867, and *Prexxie Pascual and Arturo*
8 *Fonseca v. Satellite Healthcare, Inc.*, Santa Clara Superior Court Case No. 19CV345211.

9 10. To date, my office has incurred \$6,498.39 in costs. The costs are all litigation-
10 related costs, including filing fees, mediation fees, postage, copying, and court reporter fees.
11 Attached hereto as **Exhibit B** is a copy of costs my firm has incurred in connection with the
12 prosecution of this lawsuit.

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

15 Executed on this 6th day of August 2021, at Los Angeles, California.

16 
17 _____
18 Larry W. Lee

EXHIBIT A

Menchila Villarubia Woodall v. Vasona Management, Inc.
Larry W. Lee Time and Task Chart

Hours	Description of Work
2.7	Review client documents and perform research on Defendant
2.1	Review Complaint and PAGA notice.
.9	Review Defendant's PAGA "cure" notice and response.
1.0	Review data informally produced by Defendant
1.7	Edit mediation brief
.9	Edit MOU
2.3	Edit settlement agreement
3.5	Edit Motion for Approval
15.1	TOTAL HOURS

EXHIBIT B

1/5/2021
9:43 AM

DIVERSITY LAW GROUP
Slip Listing

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Selection Criteria

Slip Classification Open
Client (hand select) Include: Woodall, Menchila
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		
62115	EXP	Olympia	1	75.00	75.00
4/8/2020		Court fees			
WIP		Woodall, Menchila			
LWDA					
62447	EXP	Olympia	1	1483.77	1483.77
4/20/2020		Court fees			
WIP		Woodall, Menchila			
Odyssey - Complaint					
62569	EXP	Olympia	1	6.90	6.90
4/30/2020		Postage			
WIP		Woodall, Menchila			
Postage					
62814	EXP	Olympia	1	155.34	155.34
5/15/2020		Atty Service			
WIP		Woodall, Menchila			
Attorney Service - Complaint Service					
62883	EXP	Olympia	2	0.25	0.50
5/31/2020		Photocopies			
WIP		Woodall, Menchila			
Photocopies					
62884	EXP	Olympia	1	0.50	0.50
5/31/2020		Postage			
WIP		Woodall, Menchila			
Postage					
62767	EXP	Olympia	1	5.72	5.72
6/8/2020		Court fees			
WIP		Woodall, Menchila			
Odyssey - POS of Summons					
63208	EXP	Olympia	1	5.72	5.72
7/16/2020		Court fees			
WIP		Woodall, Menchila			
Odyssey - FAC					

1/5/2021
9:43 AM

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		
63416	EXP	Olympia	1	400.00	400.00
7/29/2020		Arbitrators			
WIP		Woodall, Menchila			
JAMS - Demand for Arbitration					
63739	EXP	Olympia	1	5.72	5.72
8/28/2020		Court fees			
WIP		Woodall, Menchila			
Odyssey - Joint CMS					
64094	EXP	Olympia	29	0.25	7.25
8/31/2020		Photocopies			
WIP		Woodall, Menchila			
Photocopies					
64095	EXP	Olympia	1	2.25	2.25
8/31/2020		Postage			
WIP		Woodall, Menchila			
Postage					
63748	EXP	Nick Rosenthal	1	94.00	94.00
9/2/2020		Court fees			
WIP		Woodall, Menchila			
Courtcall					
65268	EXP	Olympia	1	4000.00	4000.00
12/15/2020		Arbitrators			
WIP		Woodall, Menchila			
Duckworth & Peters LLP Mediation					
65505	EXP	Larry W. Lee	1	5.72	5.72
12/30/2020		Court fees			
WIP		Woodall, Menchila			
Odyssey - Joint CMS					
Grand Total					
		Billable	0.00		6248.39
		Unbillable	0.00		0.00
		Total	0.00		6248.39