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Attorneys for Plaintiff Charles Rodriguez, on behalf
of himself and all others similarly situated

Additional counsel listed on next page.

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES**

CHARLES RODRIGUEZ, an individual,
on behalf of himself and all others similarly
situated,

Plaintiff,

v.

U.S. BANK NATIONAL ASSOCIATION,
dba U.S. Bank; and DOES 1 through 100,
inclusive

Defendants.

Case No. BC617356

CLASS ACTION

Assigned to: Hon. Amy D. Hogue; Dept. 7

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

Date: March 9, 2022

Time: 11:00 a.m.

Dept.: 7

Action filed: April 15, 2016

Related Case: 19STCV17516

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
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Attorneys for Plaintiff Ali Malik, Atefeh Yousefi,
and all others similarly situated.

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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 Plaintiffs Amirlik and Atefeh Yousefi (collectively, "Plaintiffs"). 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, I have zealously represented the interests of the class. Settlement was obtained for the benefit of the class, as opposed to the individual Plaintiffs.

3. I have been approved as class counsel on a number of prior cases, have litigated numerous other class action cases, and am competent to represent the class. Based on my review of the information, and based on my experience in class action litigation, I believe this settlement to be adequate and reasonable.

4. I am one of the primary attorneys on this matter. My qualifications are as follows: I earned 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. After 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.

5. My firm's primary focus is employment law. I have handled a number of wage and matters including class actions and multiple-plaintiff actions. I have a practice that passes cases in 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 District Courts for the Central, Eastern and Northern Districts of California.

6. I have been named as Class Counsel in a number of class actions that have been given final approval by the Superior Courts of Los Angeles County, Orange County, San Diego County, and the United States District Court for the Central District of California,

1 including the following Class Actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco
2 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County
3 Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV
4 06-0196-RSWL (PJWx); Universal Protection Overtime Cases, Orange County Superior Court,
5 Judicial Council Coordination Proceeding No. 4480; and *Hernandez v. CVS Corp. et al.*, Judicial
6 Council Coordination Proceeding No. 4539 .

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

9 Executed on November 29, 2021, at Los Angeles, California.

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12 Larry W. Lee
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PROOF OF SERVICE

I am employed in the office of a member of the bar of this Court at whose direction this service was made. I am over the age of 18 and not a party to the within action; my business address is 9327 Fairway View Place, Ste. 100, Rancho Cucamonga, California 91730.

On November 29, 2021, I served the foregoing document described as **DECLARATION OF LARRY W. LEE IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND PAGA SETTLEMENT** on the interested parties in this action as follows:

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SERVICE BY CASEANYWHERE

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515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
Attorneys for Plaintiff Ali Malik and Atefeh Yousefi
SERVICE BY EMAIL

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PROOF OF SERVICE

1 I am “readily familiar” with the firm’s practice of services of process. Under that
2 practice, this document would be deposited:

3 **(VIA E-SERVICE)** I caused the document(s) to be served by CASEANYWHERE
4 by transmitting a true and correct copy to CASEANYWHERE to serve the parties listed
5 above; and

6 **(BY EMAIL)** I caused the document(s) to be sent to the person(s) at the electronic
7 address(es) listed above.

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

10 Executed on November 29, 2021 at Rancho Cucamonga, California.

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13 Yvonne Medina
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