

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
Nicholas Rosenthal (State Bar No. 268297)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile

William L. Marder (State Bar No. 170131)
Polaris Law Group
501 San Benito Street, Suite 200
Hollister, CA 95023
(831) 531-4214
(831) 634-0333 facsimile

Attorneys for Plaintiff, the Class, and Aggrieved Employees

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

NICOLA ROMANO, as an individual and
on behalf of all others similarly situated,

Plaintiffs,

vs.

SSA TERMINALS, LLC, a Delaware
limited liability company; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 20STCV29048

[Assigned for all purposes to the Hon. William F.
Highberger, Department 10]

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

Date: November 9, 2022

Time: 11:00 a.m.

Dept.: 10

Complaint Filed: July 30, 2020

Trial Date: None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

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 Virginia, and am with the law firm Diversity Law Group, counsel of record for Plaintiff Nicola (‘‘Plaintiff’’). I have personal knowledge of the facts set forth below and if called to I could and would do so competently.

2. Based on Class Counsel's independent investigations and evaluations, I am of the opinion that the proposed settlement is fair, reasonable, and adequate, and is in the best interests of the Settlement Class Members, in light of all known facts and circumstances, and the expenses and risks inherent in litigation. The settlement was negotiated at arm's length and was facilitated by an experienced and neutral mediator. Thus, this settlement should be granted final approval.

3. My qualifications are as follows: I received my JD from Arizona State University College of Law in 2003. During law school, I was a summer associate at the law firm of Ogletree Deakins Nash Smoak & Stewart, P.C., Phleger & Harrison. I graduated *cum laude* from Arizona State University College of Law, 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. For more than one and one-half years after graduating from law school, I practiced law as an associate at the Los Angeles County office of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment defense law firm representing Fortune 500 companies in employment matters, including wage and hour class actions.

4. My primary practice is employment law. I have handled a number of wage and matters including class actions and individual actions, on both plaintiff and defense sides. I practice that encompasses 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 States District Courts for the Central, Northern, and Eastern Districts of California. I have been named as class counsel in a number of class actions that have been approved for 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 Case No. JCCP 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No. BC392717; and
6 *Hernandez v. CVS Corporation*, Los Angeles Superior Court Case No. JCCP 4539.

7 5. I have been approved as class counsel in numerous other wage/hour class actions
8 that have been granted class certification and final approval.

9 6. To date, I have incurred approximately 11.0 hours in connection with the
10 litigation of this lawsuit. Attached hereto as **Exhibit A** is a chart summarizing the amount of
11 work I have incurred to date on this matter.

12 7. Thus, I anticipate the total amount of my fees incurred in this case to be
13 approximately \$8,250.00 based on an hourly rate of \$750.00 per hour. Since at least 2018, I have
14 been approved at an hourly rate of \$700.00 per hour by various Courts, in a number of matters,
15 including *Stafford v. Brinks et al.*, Los Angeles County Superior Court Case No. BC532260;
16 *Chavez v. Kenneth Cole Productions, Inc.*, Santa Clara Superior Court Case No. 17CV306407;
17 *Chavez v. Adidas*, U.S. District Court for the Northern District of California Case No. 5:16-cv-
18 06533-LHK; *Mankin v. Taste Catering*, San Mateo Superior Court Case No. 17-CIV-03497;
19 *Ricardo Macias v. SASCO*, Santa Clara County Superior Court Case No. 16CV304263; *Valles v.*
20 *Community Hospital of the Monterey Peninsula*, Monterey Superior Court Case No.
21 17CV003452; *Diaz v. WeDriveU*, Santa Clara Superior Court Case No. 17CV306547; *Sanchez v.*
22 *American Para Professional Systems, Inc.*, Santa Clara County Superior Court Case No.
23 17CV306751; *Hernandez v Pei Wei*, United States District Court, Central District of California
24 Case No. 8:17-cv-00679-JLS-JCG; *Song v. THC-Orange County, Inc.*, U.S. District Court for the
25 Central District of California Case No. 8:17-cv00965-JLS-DFMx; *Perez v. Standard Drywall,*
26 *Inc.*, Alameda County Superior Court Case No. RG15761142; *Huertas v. Chevron Stations*,
27 Santa Clara Superior Court Case No. 17CV309996; and *In re DirecTv Wage and Hour Cases*,
28 JCCP Case No. 4850. As of 2020, I increased my hourly rate to \$750.00 per hour. I have been

1 approved at \$750.00 per hour by various courts, including: *Hernandez v. Wells Fargo Bank*,
2 Santa Clara County Superior Court Case No. 16CV299319, *Carrillo v. New Balance Athletics*,
3 *Inc.*, Santa Clara County Superior Court Case No. 19CV352469; *Ramirez v. Walgreen Co.*,
4 United States District Court, Northern District of California Case No. 18-cv-03921-EJD, *Chavez*
5 *v. Converse, Inc.*, United States District Court, Northern District of California Case No. 15-cv-
6 03746-NC; *Foster v. Schindler Elevator Corporation*, Alameda County Superior Court Case No.
7 RG19029640; *Foad Hanna v. Equinix, LLC*, Santa Clara County Superior Court Case No.
8 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles County Superior Court Case No.
9 BC720144; *Mary Della Maggiora v. Watsonville Community Hospital*, Santa Cruz County
10 Superior Court Case No. 18CV00191; *Pittman v. Martinez Steel Corporation*, San Bernardino
11 County Superior Court Case No. CIVDS1823132; *Michael Randolph v. Pacific Racing*
12 *Association*, Alameda County Superior Court Case No. RG18908139; *Markham v. Quik Stop*
13 *Markets, Inc.*, Santa Clara Superior Court Case No. 19CV341582; *Siron v. Raypak, Inc.*, Ventura
14 Superior Court Case No. 56-2019-005279959-CU-OE-VTA; *Carter v. Kline Services, Inc.*, San
15 Bernardino Superior Court Case No. CIVDS1828867, and *Prexxie Pascual and Arturo Fonseca*
16 *v. Satellite Healthcare, Inc.*, Santa Clara Superior Court Case No. 19CV345211.

17 8. My firm has incurred costs in the amount of \$8,864.33. The costs are all
18 litigation-related costs, including court filing fees, CourtCall expenses, mediation fees, and travel
19 expenses associated with attending such, reproduction and photocopy costs, and postage.
20 Attached hereto as **Exhibit B** is a copy of costs my firm has incurred in connection with the
21 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 17th day of October 2022, at Los Angeles, California.

25
26 
27 Larry W. Lee
28

EXHIBIT A

Romano v. SSA Terminals
Larry W. Lee Time and Task Chart

Hours	Description of Work
1.0	Review and edit Complaint.
1.7	Review discovery responses provided by Defendant.
2.4	Edit mediation brief.
3.5	Edit settlement agreement and class notice.
1.9	Edit Motion for Preliminary Approval.
.5	Edit Motion for Final Approval.
11.0	TOTAL HOURS

EXHIBIT B

10/6/2022
4:04 PM

DIVERSITY LAW GROUP
Slip Listing

Page 1

Selection Criteria

Slip.Classification Open
Client (hand select) Include: Romano, Nicola v. SSA
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		
62952	EXP	Olympia	1	75.00	75.00
6/24/2020		Court fees			
WIP		Romano, Nicola v. SSA			
LWDA					
63318	EXP	Olympia	2	0.25	0.50
6/30/2020		Photocopies			
WIP		Romano, Nicola v. SSA			
Photocopies					
63319	EXP	Olympia	1	7.40	7.40
6/30/2020		Postage			
WIP		Romano, Nicola v. SSA			
Postage					
63507	EXP	Olympia	1	1666.34	1666.34
7/30/2020		Atty Service			
WIP		Romano, Nicola v. SSA			
Attorney Service - Complaint					
63918	EXP	Olympia	1	73.99	73.99
8/16/2020		Atty Service			
WIP		Romano, Nicola v. SSA			
Attorney Service - Complaint Service					
64321	EXP	Olympia	1	40.59	40.59
9/3/2020		Atty Service			
WIP		Romano, Nicola v. SSA			
Attorney Service - POS of Summons					
64347	EXP	Olympia	1	55.20	55.20
9/15/2020		Atty Service			
WIP		Romano, Nicola v. SSA			
Attorney Service - Notice of ISC					
64378	EXP	Olympia	1	79.45	79.45
9/30/2020		Atty Service			
WIP		Romano, Nicola v. SSA			
Attorney Service - Joint Stip re E Service					

10/6/2022
4:04 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		
64561	EXP	Olympia	20	0.25	5.00
9/30/2020		Photocopies			
WIP		Romano, Nicola v. SSA			
Photocopies					
64562	EXP	Olympia	1	1.30	1.30
9/30/2020		Postage			
WIP		Romano, Nicola v. SSA			
Postage					
64713	EXP	Olympia	1	92.45	92.45
10/7/2020		Atty Service			
WIP		Romano, Nicola v. SSA			
Attorney Service - Joint ISC					
65151	EXP	Olympia	1	87.60	87.60
12/4/2020		Court fees			
WIP		Romano, Nicola v. SSA			
Case Anywhere					
65670	EXP	Olympia	1	5250.00	5250.00
1/13/2021		Arbitrators			
WIP		Romano, Nicola v. SSA			
Judicate West Mediation					
65976	EXP	Olympia	1	54.20	54.20
1/14/2021		Atty Service			
WIP		Romano, Nicola v. SSA			
Attorney Service - Joint Report					
66361	EXP	Olympia	1	138.00	138.00
3/8/2021		Court fees			
WIP		Romano, Nicola v. SSA			
Case Anywhere					
66818	EXP	Olympia	1	53.70	53.70
3/24/2021		Atty Service			
WIP		Romano, Nicola v. SSA			
Attorney Service - Joint Report					
66688	EXP	Nick Rosenthal	1	15.00	15.00
4/1/2021		Court fees			
WIP		Romano, Nicola v. SSA			
LACourt Connect					
67534	EXP	Olympia	1	126.00	126.00
6/8/2021		Court fees			
WIP		Romano, Nicola v. SSA			
Case Anywhere					

10/6/2022
4:04 PM

DIVERSITY LAW GROUP
Slip Listing

Page 3

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		
68359	EXP	Olympia	1	75.20	75.20
7/19/2021		Atty Service			
WIP		Romano, Nicola v. SSA			
Attorney Service - Joint Status Report					
68172	EXP	Nick Rosenthal	1	15.00	15.00
7/26/2021		Court fees			
WIP		Romano, Nicola v. SSA			
LACC					
68736	EXP	Olympia	1	144.00	144.00
9/8/2021		Court fees			
WIP		Romano, Nicola v. SSA			
Case Anywhere					
69283	EXP	Olympia	305	0.25	76.25
9/30/2021		Photocopies			
WIP		Romano, Nicola v. SSA			
Photocopies					
69284	EXP	Olympia	1	8.10	8.10
9/30/2021		Postage			
WIP		Romano, Nicola v. SSA			
Postage					
69424	EXP	Olympia	1	195.13	195.13
10/15/2021		Atty Service			
WIP		Romano, Nicola v. SSA			
Attorney Service					
69468	EXP	Christine Choo	1	12.07	12.07
10/25/2021		Court fees			
WIP		Romano, Nicola v. SSA			
ACE E Filing - Joint CMS					
70073	EXP	Olympia	1	126.00	126.00
12/9/2021		Court fees			
WIP		Romano, Nicola v. SSA			
Case Anywhere					
70960	EXP	Olympia	1	120.00	120.00
3/7/2022		Court fees			
WIP		Romano, Nicola v. SSA			
Case Anywhere					
71581	EXP	Erika Mejia	1	75.82	75.82
3/30/2022		Court fees			
WIP		Romano, Nicola v. SSA			
ACE E Filing - MPA					

10/6/2022
4:04 PM

DIVERSITY LAW GROUP
Slip Listing

Page 4

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		
72126	EXP	Olympia	1	14.02	14.02
6/9/2022		Court fees			
WIP		Romano, Nicola v. SSA			
ACE E Filing - Notice of Ruling					
72228	EXP	Olympia	1	14.02	14.02
6/21/2022		Court fees			
WIP		Romano, Nicola v. SSA			
ACE E Filing - Supp Decl of NR					
72230	EXP	Olympia	1	5.00	5.00
6/22/2022		Court fees			
WIP		Romano, Nicola v. SSA			
Online LASC Order					
72245	EXP	Olympia	1	162.00	162.00
6/24/2022		Court fees			
WIP		Romano, Nicola v. SSA			
Case Anywhere					
Grand Total					
			Billable	0.00	8864.33
			Unbillable	0.00	0.00
			Total	0.00	8864.33