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Attorneys for Plaintiff, the Class, and Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KERN

VALERIA RODRIGUEZ, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

vs.

JOHN BEAN TECHNOLOGIES
CORPORATION, a Delaware corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: BCV-20-101913-JEB

[Assigned for all purposes to the Hon. J. Eric
Bradshaw, Dept. J]

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

Date: January 27, 2022

Time: 8:30 a.m.

Dept.: J

Complaint Filed: August 17, 2020

FAC Filed: August 18, 2021

Trial Date: None

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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 Alma Rodriguez (“Plaintiff”). I have personal knowledge of the facts set forth below and if sworn to testify I could and would do so competently.

3. From the inception of the case, Class Counsel has zealously represented the interests of the Class. Class Counsel engaged in significant discussions with opposing counsel to obtain informal data on behalf of the Class. This Settlement was obtained for the benefit of the Class, as opposed to the individual Class Representative.

5. Plaintiff's Counsel does not have any relationship with or connection to Asian Americans Advancing Justice – Los Angeles (AAJC), the proposed *cy pres* beneficiary.

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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.

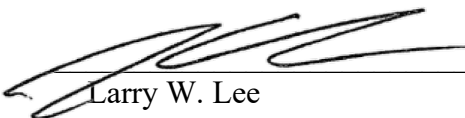
7. My firm's primary focus is employment law. I have handled a number of wage and hour matters including class actions and multiple-plaintiff actions. I have a practice that encompasses cases in the Los Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County Superior Courts, the San Diego County Superior Courts, and the United States District Courts for the Central, Eastern and Northern Districts of California.

8. 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, San Francisco 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; and Hernandez v. CVS Corp. et al., Judicial Council Coordination Proceeding No. 4539.

9. My co-counsel and I will adequately represent the Class Members in this action. Plaintiff's Counsel have and will zealously represent Plaintiff and the Class and pursue this lawsuit to its conclusion. I have no conflicts with the Class and will adequately represent the Class.

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

Executed on December 20, 2021 at Los Angeles, California.


Larry W. Lee