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Attorneys for Plaintiff, the Class, and Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN MATEO**

DOMENIC CIARLANTI, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

vs.

PROVIDENT CREDIT UNION, a
California nonprofit corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: 20-CIV-03398

(Assigned to the Honorable Don R. Franchi, Dept.
15)

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

Date: April 14, 2025

Time: 2:00 p.m.

Dept.: 15

Complaint Filed: August 11, 2020

FAC Filed: March 25, 2021

SAC Filed: May 20, 2022

Trial Date: None Set

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

2. The Joint Stipulation of Class Action Settlement (“Settlement Agreement”) ¹ was the product of negotiation between highly able and experienced attorneys on both sides who reviewed the relevant data and extensive legal research which they had carefully analyzed. Plaintiff’s Counsel engaged in informal and formal discovery and significant discussions with Defendant’s counsel to obtain informal data and documents on behalf of the Class. This settlement was entered into for the benefit of the Class, as opposed to the individual Class Representative.

3. The settlement in the case at bar warrants approval and carries a presumption of

4. As previously noted in the application for Preliminary Approval, this current settlement

5. negotiated at arm's length. I support the settlement as fair, reasonable and adequate, and in

6. the best interest of the Class Members as a whole.

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

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 Beck, 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

¹ The Joint Stipulation of Class Action Settlement as to referred to herein is the amended version that the Court preliminarily approved on September 16, 2024.

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 San Francisco County Superior Courts, the San Diego County Superior Courts, and the United States District Courts for the Central, Eastern, Northern, and Southern 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, San Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino County, Santa Clara County, Sonoma County, and the United States District Court for the Central, Eastern, and Northern Districts of California, including but not limited to 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; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination Proceeding No. 4539; *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-00182; *Valles v. Community Hospital of the Monterey Peninsula*, Monterey County Superior Court Case No. 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior Court Judicial Council Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*, Alameda County Superior Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*, Yolo County Superior Court Case No. CV-18-558.

8. To date, I have incurred approximately 55.8 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.

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1 9. I was approved at an hourly rate of \$800.00 per hour in *Martinez and Acosta v.*
2 *City of Hope National Medical Center, et al.*, San Bernardino County Superior Court Case No.
3 CIVDS2015729; *Jaime Moen v. Genentech, Inc.*, San Diego County Superior Court Case No.
4 37-2021-00008619-CU-OE-CTL; *Murray v. Granite Wellness Centers et al.*, Nevada County
5 Superior Court Case No. CU20-084680; *Smith, et al. v. Clean Harbors Environmental Services,*
6 *Inc.*, Sacramento County Superior Court Case No. 34-2021-00292526; *Correa et al. v. FedEx*
7 *Supply Chain, Inc.*, San Bernardino County Superior Court Case No. CIVDS2023369; *Meguro v.*
8 *Silicon Valley Bank*, Santa Clara County Superior Court Case No. 20CV369854; and *Linaki v.*
9 *Genji Pacific, LLC*, Alameda County Superior Court Case No. RG20074795.

10 10. Additionally, I have been approved at an hourly rate of \$850.00 by various courts
11 in a number of matters, including *Stephenson v. Healthcare Services, Inc.*, Orange County
12 Superior Court Case No. 30-2019-01078609-CU-OE-CXC, *Lakey v. Poshmark, Inc.*, Santa Clara
13 Superior Court, Case No. 22CV395084; *Audycki v. Stanford Health Care*, Santa Clara Case No.
14 19CV347173; *Palomino v. Northrop Grumman Systems Corporation*, Santa Clara Superior
15 Court Case No. 19CV345534; *Lakey v. Poshmark, Inc.*, Santa Clara Superior Court, Case No.
16 22CV395084; *Stephenson v. Healthcare Services, Inc.*, Orange County Superior Court Case No.
17 30-2019-01078609-CU-OE-CXC; and *Medina v. United Airlines, Inc.*, Los Angeles Superior
18 Court, Case No. BC624742.

19 11. As of January 1, 2024, my hourly rate for class and representative actions
20 increased to \$900.00 per hour. I was approved at an hourly rate of \$900.00 in *Jordan v.*
21 *Mondelez Global LLC*, San Bernardino County Case No. CIVSB2202758.

22 12. The total lodestar for my hours will be approximately \$50,220.00 based on an
23 hourly rate of \$900.00 per hour.

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1 13. I do not have any relationship with or connection to the California State Bar's
2 Justice Gap Fund, the proposed *cy pres* beneficiary.

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

5 Executed on this 20th day of March 2025, at Los Angeles, California.

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EXHIBIT A

Ciarlanti v. Provident Credit Union
Larry W. Lee Time and Task Chart

Hours	Description of Work
3.2	Initial research and review of background facts in preparation for filing of class action claims; draft PAGA letter; confer with co-counsel re theories of liability and conduct research re same; analysis and research re defendant
2.1	Review and revise complaint.
.4	Review Defendant's Answer
1.6	Review and revise drafts of initial discovery requests, including Requests for Production and Special Interrogatories.
1.8	Analyze and review notice of case management conference; meet and confer with defense counsel re same; review and revise joint statements.
1.1	Review and revise first amended complaint
.6	Review and revise Joint Stipulation and Proposed Order to Amend Complaint adding PAGA claims to class complaint
2.4	Review defendant's responses to discovery; meet and confer re same; review document production re same
.7	Meet and confer with defense counsel re mediation/settlement
5.3	Review and revise mediation brief for first mediation; review class payroll data; conferences with mediator re same
6.4	Attend first mediation
1.1	Review and revise second amended complaint; meet and confer re same
4.9	Review and revise mediation brief for second mediation; review class payroll data
7.7	Attend second mediation
4.2	Review and revise settlement agreement and related documents (i.e., settlement agreement, class notice); conversations with opposing counsel re same
2.1	Review and revise Motion for Preliminary Approval and Declarations thereto; confer with co-counsel and opposing counsel re same
3.3	Review tentative ruling re preliminary approval; confer with opposing counsel regarding changes to settlement agreement; review and revise amended settlement agreement documents
2.6	Review and revise renewed motion for preliminary approval and supporting documents.
1.5	Correspond with settlement administrator regarding distribution of class notice; analyze and review reports from class administrator re opt-outs

Hours	Description of Work
	received; correspond and confer with class members and respond to inquiries re settlement
2.8	Review and revise motion for final approval and supporting documents; confer with co-counsel re the same
55.8	TOTAL HOURS