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14 Attorneys for Plaintiff, the Class, and Aggrieved Employees

11
12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **FOR THE COUNTY OF SACRAMENTO**

14 EDWARD ALCANTAR, as an individual
15 and on behalf of all others similarly situated,

16 Plaintiffs,

17 vs.

18 AEROJET ROCKETDYNE, INC., an Ohio
19 corporation; and DOES 1 through 50,
20 inclusive,

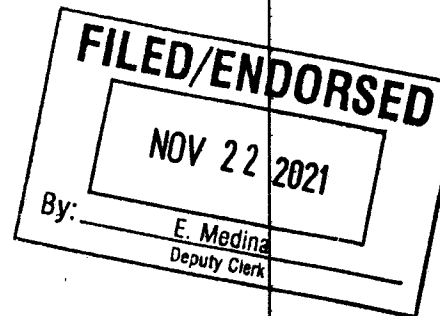
21 Defendants.

Case No.: 31-2020-00281224

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

Date: December 16, 2021
Time: 9:00 a.m.
Dept.: 54

Complaint Filed: June 29, 2020
FAC Filed: July 12, 2021



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

2. The Notice of Class Action Settlement (“Settlement Class Notice”) provided Class Members with my office’s contact information, where they could further seek information regarding the class settlement, leave questions for the Settlement Administrator, and update their address.

3. There were no objections to the amount of attorneys' fees or litigation costs that Class Counsel seek in this case and for which Plaintiff asks the Court for final approval.

4. The Settlement Agreement and Release (“Settlement Agreement”) was the product of negotiation between highly able and experienced attorneys on both sides who possessed the relevant data and extensive legal research which they had carefully analyzed. Class Counsel engaged in extensive factual investigation before settling, including reviewing class data and payroll records produced by Defendant relating to each putative class member. This allowed Plaintiff to conduct a full damage analysis.

5. The Settlement in the case at bar warrants approval and carries a presumption of fairness. As previously noted in the application for Preliminary Approval, this current settlement was negotiated at arm's length. I support the settlement as fair, reasonable, and adequate, and in the best interest of the Class Members as a whole.

6. I have been approved as class counsel in numerous other wage/hour class actions that have been granted class certification and final approval, 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; *Hernandez v Pei Wei*, United

1 States District Court, Central District of California Case No. 8:17-cv-00679-JLS-JCG; *Foaad*
2 *Hanna v. Equinix, LLC*, Santa Clara County Superior Court Case No. 18CV339365; *Alicia*
3 *Harris v. 24 Seven LLC*, Los Angeles County Superior Court Case No. BC720144; *Mary Della*
4 *Maggiore v. Watsonville Community Hospital*, Santa Cruz County Superior Court Case No.
5 18CV00191; *Pittman v. Martinez Steel Corporation*, San Bernardino County Superior Court
6 Case No. CIVDS1823132; *Michael Randolph v. Pacific Racing Association*, Alameda County
7 Superior Court Case No. RG18908139; *Markham v. Quik Stop Markets, Inc.*, Santa Clara
8 Superior Court Case No. 19CV341582; *Siron v. Raypak, Inc.*, Ventura Superior Court Case No.
9 56-2019-005279959-CU-OE-VTA; *Carter v. Kline Services, Inc.*, San Bernardino Superior
10 Court Case No. CIVDS1828867, and *Prexxie Pascual and Arturo Fonseca v. Satellite*
11 *Healthcare, Inc.*, Santa Clara Superior Court Case No. 19CV345211.

12 7. My qualifications are as follows: I received my JD from Arizona State University
13 College of Law in 2003. During law school, I was a summer associate at the law firm of
14 Brobeck, Phleger & Harrison. I graduated *cum laude* from Arizona State University College of
15 Law in the top 10% of my class. While I was in law school, I was the Associate Managing Editor
16 of the Arizona State University College of Law, Law Journal. For more than one and one-half
17 years after graduating from law school, I practiced law as an associate at the Los Angeles County
18 offices of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment defense law
19 firm, representing Fortune 500 companies in employment matters, including wage and hour class
20 actions.

21 8. My primary practice is employment law. I have handled a number of wage and
22 hour matters including class actions and individual actions, on both plaintiff and defense sides. I
23 have a practice that encompasses cases throughout the State of California, including but not
24 limited to the Los Angeles Superior Courts, the Orange County Superior Courts, the San
25 Francisco County Superior Courts, the San Diego County Superior Courts, and the United States
26 District Courts for the Central, Eastern, Northern, and Southern Districts of California. I have
27 been named as Class Counsel in a number of class actions that have been granted final approval
28 by the Superior Courts of Los Angeles County, Orange County, San Francisco County, Alameda

1 County, Contra Costa County, Monterey County, San Bernardino County, Santa Clara County,
2 Sonoma County, and the United States District Court for the Central, Eastern, and Northern
3 Districts of California.

4 9. To date, my office has incurred \$12,219.94 in costs. The costs are all litigation-
5 related costs, including filing fees and mediation fees. Attached hereto as **Exhibit A** is a copy of
6 costs my firm has incurred in connection with the prosecution of this lawsuit.

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

9 Executed on this 22nd day of November 2021, at Los Angeles, California.

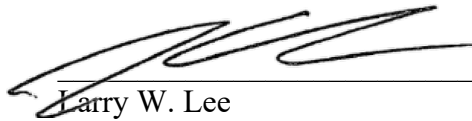
10
11 
12 Larry W. Lee

EXHIBIT A

11/17/2021
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DIVERSITY LAW GROUP
Slip Listing

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Selection Criteria

Slip Classification Open
Client (hand select) Include: Alcantar, Edward v. Aerojet
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		
62917	EXP	Olympia	1	75.00	75.00
6/16/2020		Court fees			
WIP		Alcantar, Edward v. Aerojet			
LWDA					
63152	EXP	Olympia	1	1630.95	1630.95
6/29/2020		Atty Service			
WIP		Alcantar, Edward v. Aerojet			
Attorney Service - Complaint					
63235	EXP	Olympia	1	6.90	6.90
6/30/2020		Postage			
WIP		Alcantar, Edward v. Aerojet			
Postage					
63480	EXP	Olympia	1	63.25	63.25
7/13/2020		Atty Service			
WIP		Alcantar, Edward v. Aerojet			
Attorney Service - Complaint Service					
63495	EXP	Olympia	1	52.45	52.45
7/20/2020		Atty Service			
WIP		Alcantar, Edward v. Aerojet			
Attorney Service - POS of Summons					
63910	EXP	Olympia	1	83.09	83.09
8/12/2020		Atty Service			
WIP		Alcantar, Edward v. Aerojet			
Attorney Service - Notice of Complex Determination					
63961	EXP	Olympia	6	0.25	1.50
8/31/2020		Photocopies			
WIP		Alcantar, Edward v. Aerojet			
Photocopies					
63962	EXP	Olympia	1	0.65	0.65
8/31/2020		Postage			
WIP		Alcantar, Edward v. Aerojet			
Postage					

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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		
64934	EXP	Olympia	1	13.75	13.75
10/8/2020		Other expenses			
WIP		Alcantar, Edward v. Aerojet			
Validations					
65497	EXP	Olympia	1	9000.00	9000.00
12/29/2020		Arbitrators			
WIP		Alcantar, Edward v. Aerojet			
Serratore Law Mediation					
65944	EXP	Olympia	1	57.45	57.45
1/6/2021		Atty Service			
WIP		Alcantar, Edward v. Aerojet			
Attorney Service - Notice of CMC					
66714	EXP	Larry W. Lee	1	34.48	34.48
1/20/2021		Meals			
WIP		Alcantar, Edward v. Aerojet			
Meal					
66713	EXP	Larry W. Lee	1	5.92	5.92
1/21/2021		Meals			
WIP		Alcantar, Edward v. Aerojet			
Meal					
66797	EXP	Olympia	1	54.45	54.45
3/18/2021		Atty Service			
WIP		Alcantar, Edward v. Aerojet			
Attorney Service - Joint CMS					
67162	EXP	Olympia	1	55.95	55.95
4/12/2021		Atty Service			
WIP		Alcantar, Edward v. Aerojet			
Attorney Service - Notice of Minute Order					
67843	EXP	Olympia	1	85.70	85.70
6/23/2021		Atty Service			
WIP		Alcantar, Edward v. Aerojet			
Attorney Service - Stip					
67847	EXP	Olympia	1	53.95	53.95
6/24/2021		Atty Service			
WIP		Alcantar, Edward v. Aerojet			
Attorney Service - CMS					
68338	EXP	Olympia	1	54.95	54.95
7/9/2021		Atty Service			
WIP		Alcantar, Edward v. Aerojet			
Attorney Service - Notice					

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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		
68344	EXP	Olympia	1	59.95	59.95
7/12/2021		Atty Service			
WIP		Alcantar, Edward v. Aerojet			
Attorney Service - Notice of Entry of Order					
68859	EXP	Erika Mejia	1	218.20	218.20
8/3/2021		Atty Service			
WIP		Alcantar, Edward v. Aerojet			
Attorney Service - MPA					
68866	EXP	Olympia	1	55.95	55.95
8/10/2021		Atty Service			
WIP		Alcantar, Edward v. Aerojet			
Attorney Service - Notice of Minute Order					
69600	EXP	Olympia	1	55.45	55.45
10/19/2021		Atty Service			
WIP		Alcantar, Edward v. Aerojet			
Attorney Service - Notice					
69753	EXP	Olympia	1	500.00	500.00
11/17/2021		Court fees			
WIP		Alcantar, Edward v. Aerojet			
Motion for Final Approval Fees					
Grand Total					
			Billable	0.00	12219.94
			Unbillable	0.00	0.00
			Total	0.00	12219.94