

Larry W. Lee (State Bar No. 228175)  
Mai Tulyathan (State Bar No. 316704)  
**DIVERSITY LAW GROUP, P.C.**  
515 S. Figueroa Street, Suite 1250  
Los Angeles, CA 90071  
(213) 488-6555  
(213) 488-6554 facsimile

Attorneys for Plaintiff, the Class, and Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SACRAMENTO**

VAN WALKER, as an individual and on  
behalf of all others similarly situated,

Plaintiffs,

vs.

WFS EXPRESS, INC., a Delaware  
corporation; and DOES 1 through 50,  
inclusive,

Defendants.

Case No.: 34-2020-00285301-CU-OE-GDS

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

Date: March 9, 2022  
Time: 1:30 p.m.  
Dept.: 53

**Reservation No.: 2603858**

Complaint Filed: August 5, 2020  
Trial Date: None

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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 Van walker (“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 proposed settlement meets the criteria for this Court to grant final approval of this matter on a class-wide basis, as the settlement is fair, adequate, and reasonable.

3. I have spent significant time researching and pursuing the claims that have been alleged in this action. Based on my 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 Class Members, in light of all known facts and circumstances, and the expenses and risks inherent in litigation. The settlement was negotiated at arms' length and was facilitated by an experienced and neutral mediator. Thus, this settlement should be granted final approval.

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

5. I support the settlement as fair, reasonable, and adequate, and in the best interest of the Class Members as a whole.

6. 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 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. For more than one and one-half years after graduating from law school, 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, representing Fortune 500 companies in employment matters, including wage and hour class actions.

7. My primary practice is employment law. I have handled a number of wage and

1 hour matters including class actions and individual actions, on both plaintiff and defense sides. I  
2 have a practice that encompasses cases throughout the State of California, including but not  
3 limited to the Los Angeles Superior Courts, the Orange County Superior Courts, the San  
4 Francisco County Superior Courts, the San Diego County Superior Courts, and the United States  
5 District Courts for the Central, Eastern, Northern, and Southern Districts of California. I have  
6 been named as Class Counsel in a number of class actions that have been granted final approval  
7 by the Superior Courts of Los Angeles County, Orange County, San Francisco County, Alameda  
8 County, Contra Costa County, Monterey County, San Bernardino County, Santa Clara County,  
9 Sonoma County, and the United States District Court for the Central, Eastern, and Northern  
10 Districts of California, including but not limited to the following class actions: Chan Lanier v.  
11 Citigroup, Inc. et al., San Francisco Superior Court Case No. CGC-05-445143; Naqvi v.  
12 Acoustic Home Loans et al., Orange County Superior Court Case No. 05CC00263; Ortega v.  
13 AIG, Central District of California Case No. CV 06-0196-RSWL (PJWx); Universal Protection  
14 Overtime Cases, Orange County Superior Court Case No. JCCP 4480; Tse v. Best Buy, Los  
15 Angeles Superior Court Case No. BC392717; and Hernandez v. CVS Corporation, Los Angeles  
16 Superior Court Case No. JCCP 4539.

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

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

21 Executed on February 14, 2022, at Los Angeles, California.

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