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7 Attorneys for Plaintiff Robert Lawson
and Proposed Class Counsel
8

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF BUTTE**
11

12 ROBERT LAWSON, on behalf of himself
and all "aggrieved employees" pursuant to
13 Labor Code § 2698 *et seq.*,

14 Plaintiff,

15 v.

16 GRAPHIC PACKAGING
INTERNATIONAL, LLC, a Delaware
17 limited liability company, and DOES 1
through 10, inclusive,

18 Defendants.
19
20
21

CASE NO: 20CV01921

*Assigned to the Honorable Robert A. Glusman,
Dept. 10*

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF UNOPPOSED MOTION AND
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT AND SEEKING
LEAVE TO FILE FIRST AMENDED
COMPLAINT**

DATE: March 23, 2022

TIME: 9:00 a.m.

DEPT.: 10

Action Filed: September 29, 2020

22
23 I, LARRY W. LEE, hereby declare and state as follows:
24

25 1. I am an attorney at law, duly licensed to practice before all Courts in the State of
26 California, and am with the law firm Diversity Law Group, counsel of record for Named Plaintiff
27 Marcos Castro ("Plaintiff Castro"). I have personal knowledge of the facts set forth below and if
28 called to testify I could and would do so competently.

1 2. On October 29, 2020, Plaintiff Castro sent a letter to the LWDA, alleging
2 Defendant violated the California Labor Code and seeking penalties under PAGA. On August 9,
3 2021, Plaintiff Castro submitted a supplemental letter to the LWDA alleging additional violations
4 under the California Labor Code. Specifically, Plaintiff Castro alleged Defendant failed to pay
5 minimum and overtime wages to Defendant's non-exempt California employees and failed to
6 provide accurate itemized wage statements.

7 3. On December 2, 2020, Plaintiff Castro initiated his Action in the Orange County
8 Superior Court by filing a Class and Representative Action Complaint, on behalf of himself and
9 all other aggrieved employees (the "Castro Action").

10 4. From the inception of the case, Class Counsel has zealously represented the
11 interests of the Class. This settlement was obtained for the benefit of the Class, as opposed to the
12 individual Class Representative.

13 5. Based on my review of all the documents and information, and based on my
14 experience in class action litigation, I believe this settlement to be fair, adequate, and reasonable.

15 6. I am one of the primary attorneys on this matter. My qualifications are as follows:
16 I received my J.D. from Arizona State University College of Law in 2003. During law school, I
17 was a summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated cum laude
18 from Arizona State University College of Law in the top 10% of my class. While I was in law
19 school, I was the Associate Managing Editor of the Arizona State University College of Law,
20 Law Journal. Upon graduation, I practiced law as an associate at the Los Angeles County offices
21 of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment defense law firm that
22 represents a significant number of Fortune 500 companies.

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

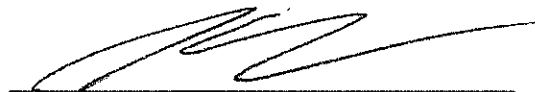
 8. I have been approved as Class Counsel in a number of class actions, including but

1 not limited to *Chan-Lanier v. Citibank* (Case No. CGC-050445143); *Hernandez v. CVS*
2 *Pharmacy, Inc.* (Judicial Council Coordination Proceeding No. 4539), *Tse v. Best Buy Co, Inc.*
3 (Case Number BC 393717), *Orgeta v. AIG, Inc* (Case Number CV 06—196-RSWL (PJWx)), and
4 *Castro v. UPS Freight, Inc.* (Case Number CV 08-4898 ODW (CWx)) and by this Court in
5 *Chavez v. PVH* (Case No. C 13-01797 LHK).

6 9. In addition, I was certified as class counsel by the United States District Court,
7 Central District of California in the cases *Abdullah v. U.S. Security* (Case Number CV 09-09554
8 GHK), *Avilez v. Pinkerton Government Services, Inc.* (Case Number SACV 11-0493-DOC),
9 *Dynabursky v. Allied Barton Security Services* (Case Number SACV 12-02210 JST); and *Pace v.*
10 *Petsmart, Inc.* (Case Number SACV 13-500-DOC); by the Northern District of California in the
11 cases of *Harris v. Vector Marketing Corp.*, (Case Number CV 08 5198 EMC), and *Lemus et al. v.*
12 *H&R Block Enterprises, LLC* (Case Number CV-09-03179-SI); and by the Superior Court of
13 California, Orange County in the cases of *De la Cruz v. Abercrombie & Fitch Co. et al.* (Case
14 Number 30-2007-00036240) and *Wu v. General Nutrition Corporation* (Case Number 30-2012-
15 00593759), all as part of the Courts' orders granting class certification pursuant to Rule 23 of the
16 FRCP and California Code of Civil Procedure § 382. I served as lead counsel on these cases.

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

19 Executed on this 22nd day of February 2022, at Los Angeles, California.

20 

21 Larry W. Lee