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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA

HIROMI MEGURO, as an individual and on
behalf of all others similarly situated, and as a
private attorney general,

Plaintiff,

vs.

SILICON VALLEY BANK, a California
corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 20CV369854

[Assigned to Hon. Sunil R. Kulkarni]

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

Date: January 12, 2023
Time: 1:30 p.m.
Department: 1

Complaint Filed: August 28, 2020

1 I, Larry W. Lee, declare as follows:

2 1. I am an attorney admitted to practice in the State of California and, with the law firm
3 Diversity Law Group, P.C., am counsel of record for Plaintiff. I make this declaration on the basis of my
4 own personal knowledge, except as to those matters stated on information and belief and, as to those
5 matters, I believe them to be true. If called as a witness, I could testify competently as to the facts stated
6 in this declaration.

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

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

12 4. Class Counsel engaged in extensive factual investigation before settling, including the
13 exchange of formal and informal discovery and class data. This allowed Plaintiff to conduct a full
14 damage analysis. The Agreement was the product of negotiation between highly able and experienced
15 attorneys on both sides who possessed the relevant data and extensive legal research which they had
16 carefully analyzed.

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

21 6. My firm has a great deal of experience in wage and hour class action litigation and has
22 been approved as class counsel in a number of class actions.

23 7. I am one of the primary attorneys on this matter. My qualifications are as follows: I
24 received my J.D. from Arizona State University College of Law in 2003. During law school, I was a
25 summer associate at the law firm of Brobeck, Phleger & Harrison. I graduated cum laude from Arizona
26 State University College of Law in the top 10% of my class. While I was in law school, I was the
27 Associate Managing Editor of the Arizona State University College of Law, Law Journal. Upon
28 graduation, I practiced law as an associate at the Los Angeles County offices of Ogletree Deakins Nash

1 Smoak & Stewart, P.C., a national employment defense law firm that represents a significant number of
2 Fortune 500 companies, including wage and hour class actions.

3 8. My firm's primary focus is employment law. I have handled a number of wage and hour
4 matters including class actions and individual actions, on both plaintiff and defense sides. I have a
5 practice that encompasses cases throughout the State of California, including but not limited to the Los
6 Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County Superior
7 Courts, the San Diego County Superior Courts, and the United States District Courts for the Central,
8 Eastern, Northern, and Southern Districts of California. I have been named as Class Counsel in a
9 number of class actions that have been granted final approval by the Superior Courts of Los Angeles
10 County, Orange County, San Francisco County, Alameda County, Contra Costa County, Monterey
11 County, San Bernardino County, Santa Clara County, Sonoma County, and the United States District
12 Court for the Central, Eastern, and Northern Districts of California.

13 9. My firm has incurred costs in the amount of \$10,015.29. The costs are all litigation
14 related costs, including filing fees and mediation fees. Attached hereto as **Exhibit A** is copy of the costs
15 my firm has incurred in connection with prosecution of this lawsuit.

16 10. To date, I have incurred approximately 72.9 hours in the prosecution of this matter, with
17 an hourly rate of \$800.00 per hour. I anticipate spending an additional 10.0 hours through final approval
18 and post-approval, including conferring with class members, defense counsel, and the administrator, as
19 well as appearing for the hearing of the Motion for Final Approval. The total lodestar for my hours will
20 be approximately \$66,320.00. Attached as **Exhibit B** is a summary of my hours and tasks on this matter.
21 Since at least 2020, I have been approved at an hourly rate of \$750.00 per hour by various Courts,
22 including this Court. Examples of these Courts include the following cases: *Hernandez v. Wells Fargo*
23 *Bank*, Santa Clara County Superior Court Case No. 16CV299319, *Carrillo v. New Balance Athletics,*
24 *Inc.*, Santa Clara County Superior Court Case No. 19CV352469; *Ramirez v. Walgreen Co.*, United
25 States District Court, Northern District of California Case No. 18-cv-03921-EJD, *Chavez v. Converse,*
26 *Inc.*, United States District Court, Northern District of California Case No. 15-cv-03746-NC; *Foster v.*
27 *Schindler Elevator Corporation*, Alameda County Superior Court Case No. RG19029640; *Foaad Hanna*
28 *v. Equinix, LLC*, Santa Clara County Superior Court Case No. 18CV339365; *Alicia Harris v. 24 Seven*

1 *LLC*, Los Angeles County Superior Court Case No. BC720144; *Mary Della Maggiora v. Watsonville*
2 *Community Hospital*, Santa Cruz County Superior Court Case No. 18CV00191; *Pittman v. Martinez*
3 *Steel Corporation*, San Bernardino County Superior Court Case No. CIVDS1823132; *Michael Randolph*
4 *v. Pacific Racing Association*, Alameda County Superior Court Case No. RG18908139; *Markham v.*
5 *Quik Stop Markets, Inc.*, Santa Clara Superior Court Case No. 19CV341582; *Siron v. Raypak, Inc.*,
6 Ventura Superior Court Case No. 56-2019-005279959-CU-OE-VTA; *Carter v. Kline Services, Inc.*, San
7 Bernardino Superior Court Case No. CIVDS1828867, and *Prexxie Pascual and Arturo Fonseca v.*
8 *Satellite Healthcare, Inc.*, Santa Clara Superior Court Case No. 19CV345211.

9 11. On October 4, 2022, Plaintiff uploaded the Order Granting Plaintiff's Motion for
10 Preliminary Approval of Class Action Settlement to the LWDA's website. Concurrent with the filing of
11 this motion, Plaintiff also has uploaded the final approval motion to the LWDA.

12 12. I understand that the attorneys' fees awarded in this action will be split 65% to Diversity
13 Law Group, P.C. and 35% to Polaris Law Group.

14 I declare under penalty of perjury under the laws of the State of California that the foregoing is
15 true and correct. Executed this 19th day of December 2022, at Los Angeles, California.

16 

17 _____
Larry W. Lee

EXHIBIT A

12/12/2022
1:01 PM

DIVERSITY LAW GROUP
Slip Listing

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Selection Criteria

Slip.Classification Open
Client (hand select) Include: Meguro, Hiromi v. Silicon
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		
63781	EXP	Olympia	1	75.00	75.00
8/26/2020		Court fees			
WIP		Meguro, Hiromi v. Silicon			
LWDA					
63742	EXP	Olympia	1	1483.77	1483.77
8/28/2020		Court fees			
WIP		Meguro, Hiromi v. Silicon			
Odyssey - Complaint					
64064	EXP	Olympia	5	0.25	1.25
8/31/2020		Photocopies			
WIP		Meguro, Hiromi v. Silicon			
Photocopies					
64065	EXP	Olympia	1	7.40	7.40
8/31/2020		Postage			
WIP		Meguro, Hiromi v. Silicon			
Postage					
64333	EXP	Olympia	1	68.50	68.50
9/9/2020		Atty Service			
WIP		Meguro, Hiromi v. Silicon			
Attorney Service - Complaint Service					
64273	EXP	Olympia	1	5.72	5.72
10/1/2020		Court fees			
WIP		Meguro, Hiromi v. Silicon			
Odyssey - POS of Summons					
65706	EXP	Simon Yang	1	94.00	94.00
1/21/2021		Court fees			
WIP		Meguro, Hiromi v. Silicon			
Courtcall					
66941	EXP	Erika Mejia	1	5.72	5.72
4/16/2021		Court fees			
WIP		Meguro, Hiromi v. Silicon			
Odyssey - Joint Status Report					

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1:01 PM

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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		
67369	EXP	Simon Yang	1	94.00	94.00
5/27/2021		Court fees			
WIP		Meguro, Hiromi v. Silicon			
Courtcall					
69431	EXP	Olympia	1	7450.00	7450.00
10/18/2021		Arbitrators			
WIP		Meguro, Hiromi v. Silicon			
JAMS Mediation					
70367	EXP	Olympia	2	0.25	0.50
12/31/2021		Photocopies			
WIP		Meguro, Hiromi v. Silicon			
Photocopies					
70368	EXP	Olympia	1	7.33	7.33
12/31/2021		Postage			
WIP		Meguro, Hiromi v. Silicon			
Postage					
70428	EXP	Christine Choo	1	28.54	28.54
1/14/2022		Court fees			
WIP		Meguro, Hiromi v. Silicon			
One Legal - Joint Report					
71763	EXP	Simon Yang	1	94.00	94.00
5/12/2022		Court fees			
WIP		Meguro, Hiromi v. Silicon			
Courtcall					
72309	EXP	Erika Mejia	1	26.32	26.32
7/1/2022		Court fees			
WIP		Meguro, Hiromi v. Silicon			
Odyssey - Stip for Leave to Amend					
72576	EXP	Erika Mejia	1	67.52	67.52
7/25/2022		Court fees			
WIP		Meguro, Hiromi v. Silicon			
Odyssey - MPA					
73035	EXP	Erika Mejia	1	5.72	5.72
9/21/2022		Court fees			
WIP		Meguro, Hiromi v. Silicon			
Odyssey - CMS					
73861	EXP	Simon Yang	1	500.00	500.00
12/12/2022		Court fees			
WIP		Meguro, Hiromi v. Silicon			
Costs					

12/12/2022
1:01 PM

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Slip Listing

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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		
Grand Total				
	Billable	0.00		10015.29
	Unbillable	0.00		0.00
	Total	0.00		10015.29

EXHIBIT B

**Time and Task Summary
for Meguro v. Silicon Valley Bank
Larry W. Lee**

Description of Work	Hours
Review client documents; confer with co counsel re theories of case; research potential causes of action and viability of same	8.6
Review and revise complaint and PAGA letter	4.3
Review initial court notices and complex guidelines	1.1
Confer with counsel re CMC and case issues; review and revise joint statements	2.7
Review and revise first set of written discovery to Defendant; review Defendant's responses to same; meet and confer re same; review documents produced by Defendant	11.5
Extensive discussions with Defendant's counsel re mediation and scope of potential	5.7
Review payroll data produced by Defendant; review and revise class damages re same	4.3
Review and revise mediation brief; legal research re same	4.1
Attend mediation	8.5
Review and revise MOU; confer with counsel re same	5.2
Review and revise long form settlement documents; conferences with opposing counsel	8.6
Review and revise Motion for Preliminary Approval and supporting documents	3.6
Confer with class members re settlement issues	2.4
Review and revise Motion for Final Approval and supporting documents	2.3
TOTAL	72.9