

DIVERSITY LAW GROUP, P.C.
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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

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

Plaintiffs,

vs.

HUMANGOOD, a California corporation;
HUMANGOOD NORCAL, a California
corporation; HUMANGOOD SOCAL, a
California corporation; HUMANGOOD
FRESNO, a California corporation;
HUMANGOOD AFFORDABLE HOUSING, a
California corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. CIVDS2016835

[Hon. David Cohn, Department S26]

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

Date: February 14, 2023
Time: 10:00 a.m.
Department: S26

Complaint Filed: September 1, 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 Proposed Class Action Settlement (“Class Notice”) provided Class
8 Members with my office’s contact information, where they could further seek information regarding the
9 class 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 \$11,845.75. 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. On October 19, 2022, Plaintiff uploaded the Order Granting Plaintiff's Motion for
17 Preliminary Approval of Class Action Settlement to the LWDA's website. Concurrent with the filing of
18 this motion, Plaintiff also has uploaded the final approval motion to the LWDA.

19 I declare under penalty of perjury under the laws of the State of California that the foregoing is
20 true and correct. Executed this 20th day of January 2022, at Los Angeles, California.

21 

22 _____
Larry W. Lee

EXHIBIT A

1/6/2023
9:57 AM

DIVERSITY LAW GROUP
Slip Listing

Page 1

Selection Criteria

Slip Classification Open
Client (hand select) Include: Scott, LaVeda v. HumanGood
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		
63782	EXP	Olympia	1	75.00	75.00
8/26/2020		Court fees			
WIP		Scott, LaVeda v. HumanGoo			
LWDA					
63951	EXP	Olympia	1	2135.56	2135.56
8/31/2020		Atty Service			
WIP		Scott, LaVeda v. HumanGoo			
Attorney Service - Complaint					
64079	EXP	Olympia	11	0.25	2.75
8/31/2020		Photocopies			
WIP		Scott, LaVeda v. HumanGoo			
Photocopies					
64080	EXP	Olympia	1	28.10	28.10
8/31/2020		Postage			
WIP		Scott, LaVeda v. HumanGoo			
Postage					
64700	EXP	Olympia	1	77.74	77.74
10/1/2020		Atty Service			
WIP		Scott, LaVeda v. HumanGoo			
Attorney Service - Complaint Service					
64701	EXP	Olympia	1	49.75	49.75
10/1/2020		Atty Service			
WIP		Scott, LaVeda v. HumanGoo			
Attorney Service - Complaint Service					
64702	EXP	Olympia	1	49.75	49.75
10/1/2020		Atty Service			
WIP		Scott, LaVeda v. HumanGoo			
Attorney Service - Complaint Service					
64703	EXP	Olympia	1	49.75	49.75
10/1/2020		Atty Service			
WIP		Scott, LaVeda v. HumanGoo			
Attorney Service - Complaint Service					

1/6/2023
9:57 AM

DIVERSITY LAW GROUP
Slip Listing

Page 2

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		
64736	EXP	Olympia	1	78.56	78.56
10/13/2020		Atty Service			
WIP		Scott, LaVeda v. HumanGoo			
Attorney Service - POS of Summons					
65287	EXP	Simon Yang	1	94.00	94.00
12/18/2020		Court fees			
WIP		Scott, LaVeda v. HumanGoo			
Courtcall					
66155	EXP	Simon Yang	1	94.00	94.00
2/16/2021		Court fees			
WIP		Scott, LaVeda v. HumanGoo			
Courtcall					
69933	EXP	Olympia	1	105.71	105.71
11/4/2021		Atty Service			
WIP		Scott, LaVeda v. HumanGoo			
Attorney Service - Joint Stip for Leave					
69945	EXP	Olympia	1	74.25	74.25
11/9/2021		Atty Service			
WIP		Scott, LaVeda v. HumanGoo			
Attorney Service - Joint Status Report					
69761	EXP	Simon Yang	1	94.00	94.00
11/17/2021		Court fees			
WIP		Scott, LaVeda v. HumanGoo			
Courtcall					
71783	EXP	Olympia	1	7475.00	7475.00
5/12/2022		Arbitrators			
WIP		Scott, LaVeda v. HumanGoo			
JAMS Mediation (8,425 - 950 = 7,475)					
72260	EXP	Linda Lee	1	11.80	11.80
5/12/2022		Online researc			
WIP		Scott, LaVeda v. HumanGoo			
Online San Diego Superior Court					
72342	EXP	Simon Yang	1	94.00	94.00
7/5/2022		Court fees			
WIP		Scott, LaVeda v. HumanGoo			
Courtcall					
73022	EXP	Olympia	1	7.82	7.82
9/19/2022		Postage			
WIP		Scott, LaVeda v. HumanGoo			
Postage					

1/6/2023
9:57 AM

DIVERSITY LAW GROUP
Slip Listing

Page 3

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		
73289	EXP	Erika Mejia	1	107.46	107.46
9/19/2022		Atty Service			
WIP		Scott, LaVeda v. HumanGoo			
Attorney Service - Joint Stip					
73550	EXP	Erika Mejia	1	258.80	258.80
9/19/2022		Court fees			
WIP		Scott, LaVeda v. HumanGoo			
Bosco Legal - MPA					
73292	EXP	Erika Mejia	1	94.71	94.71
9/20/2022		Atty Service			
WIP		Scott, LaVeda v. HumanGoo			
Attorney Service - Amended Decl					
73314	EXP	Erika Mejia	1	93.71	93.71
9/27/2022		Atty Service			
WIP		Scott, LaVeda v. HumanGoo			
Attorney Service - Amended Decl of Plaintiff					
73131	EXP	Erika Mejia	1	11.50	11.50
9/29/2022		Online researc			
WIP		Scott, LaVeda v. HumanGoo			
Online San Bernardino Superior Doc					
73324	EXP	Erika Mejia	1	78.21	78.21
9/30/2022		Atty Service			
WIP		Scott, LaVeda v. HumanGoo			
Attorney Service - NOE Judgment					
73356	EXP	Olympia	1	7.82	7.82
9/30/2022		Postage			
WIP		Scott, LaVeda v. HumanGoo			
Postage					
73380	EXP	Simon Yang	1	94.00	94.00
10/12/2022		Court fees			
WIP		Scott, LaVeda v. HumanGoo			
Courtcall					
73401	EXP	Olympia	1	2.00	2.00
10/19/2022		Online researc			
WIP		Scott, LaVeda v. HumanGoo			
Online Order Granting MPA					
73988	EXP	Simon Yang	1	500.00	500.00
1/6/2023		Court fees			
WIP		Scott, LaVeda v. HumanGoo			
Final Costs					

1/6/2023
9:57 AM

DIVERSITY LAW GROUP
Slip Listing

Page 4

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		11845.75
	Unbillable	0.00		0.00
	Total	0.00		11845.75