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Attorneys for Plaintiff,
OFELIA ORTEGA on behalf of herself
and all similarly aggrieved employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF MONTEREY

OFELIA ORTEGA, on behalf of herself
and all similarly aggrieved employees,

Plaintiff,

v.

SUNLIGHT BERRY FARMS, INC.; and
DOES 1 through 50, inclusive,

Defendants.

Case No. 20CV002558

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

Date: October 28, 2022

Time: 8:30 a.m.

Dept.: 14

Complaint Filed: September 24, 2020

FAC Filed: January 1, 2021

SAC Filed: January 6, 2022

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1 cum laude from Arizona State University College of Law in the top 10% of my class. While I
2 was in law school, I was the Associate Managing Editor of the Arizona State University
3 College of Law, Law Journal. Upon graduation, I practiced law as an associate at the Los
4 Angeles County offices of Ogletree Deakins Nash Smoak & Stewart, P.C., a national
5 employment defense law firm that represents a significant number of Fortune 500 companies.

6 8. My firm's primary focus is employment law. I have handled a number of wage
7 and hour matters including class actions and multiple-plaintiff actions. I have a practice that
8 encompasses cases in the Los Angeles Superior Courts, the Orange County Superior Courts,
9 the San Francisco County Superior Courts, the San Diego County Superior Courts, and the
10 United States District Courts for the Central, Eastern and Northern Districts of California.

11 9. I have been named as Class Counsel in a number of class actions that have been
12 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
13 Francisco County, and the United States District Court for the Central District of California,
14 including the following Class Actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco
15 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange
16 County Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California
17 Case No. CV 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County
18 Superior Court, Judicial Council Coordination Proceeding No. 4480; and *Hernandez v. CVS*
19 *Corp. et al.*, Judicial Council Coordination Proceeding No. 4539.

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

22 Executed on this 6th day of September 2022, at Los Angeles, California.

23 
24 Larry W. Lee