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

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

14
15 Plaintiff,

16 v.

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

20 Defendants.
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CASE NO: 20CV01921

*Assigned to the Honorable Stephen E.
Benson, Dept. 6*

CLASS ACTION

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF UNOPPOSED MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND
UNOPPOSED APPLICATION FOR
APPROVAL OF ATTORNEYS' FEES
AND COSTS, CLAIMS
ADMINISTRATION FEES, AND CLASS
REPRESENTATIVES' SERVICE
PAYMENTS**

DATE: October 5, 2022

TIME: 9:00 a.m.

DEPT.: 6

Action Filed: September 29, 2020

DECLARATION OF LARRY W. LEE IN SUPPORT OF UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND UNOPPOSED APPLICATION FOR APPROVAL OF ATTORNEYS' FEES AND COSTS,
CLAIMS ADMINISTRATION FEES, AND CLASS REPRESENTATIVES' SERVICE PAYMENTS

1 Larry W. Lee (State Bar No. 228175)
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14 Attorneys for Plaintiff Marcos Castro and the Class

DECLARATION OF LARRY W. LEE

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 Marcos Castro ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

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

3. On December 2, 2020, Plaintiff Castro initiated his Action in the Orange County Superior Court by filing a Class and Representative Action Complaint, on behalf of himself and all other aggrieved employees (the "Castro Action"). Plaintiff Castro has now dismissed the Castro Action in the District Court, subject to a tolling agreement between the parties.

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

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

6. My firm has a great deal of experience in wage and hour class action litigation and

1 has been approved as class counsel in a number of class actions.

2 7. My qualifications are as follows: I received my JD from Arizona State University
3 College of Law in 2003. During law school, I was a summer associate at the law firm of Brobeck,
4 Phleger & Harrison. I graduated *cum laude* from Arizona State University College of Law in the
5 top 10% of my class. While I was in law school, I was the Associate Managing Editor of the
6 Arizona State University College of Law, Law Journal. For more than one and one-half years after
7 graduating from law school, I practiced law as an associate at the Los Angeles County offices of
8 Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment defense law firm,
9 representing Fortune 500 companies in employment matters, including wage and hour class
10 actions.

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

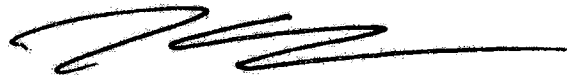
21 9. My firm has incurred costs in the amount of \$2,010.78. The costs are all litigation
22 related costs, including filing and service fees. Attached hereto as **Exhibit A** is copy of the costs
23 my firm has incurred in connection with prosecution of this lawsuit.

24 10. Mr. Castro performed the following tasks in his assistance in the prosecution of this
25 matter: (1) assisted Counsel in investigating and substantiating the claims alleged in this action,
26 including multiple interviews with counsel to review facts, documents, and Defendant's policies;
27 (2) assisted in the preparation of the complaint; (3) produced evidentiary documents to Counsel;

1 and (4) assisted in the settlement of this litigation.

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

4
5 Executed on this 21st day of September 2022, at Los Angeles, California.

6 

7
8 Larry W. Lee

EXHIBIT A

9/15/2022
9:52 AM

DIVERSITY LAW GROUP
Slip Listing

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Selection Criteria

Slip Classification Open
Client (hand select) Include: Castro, Marcos v. Graphic Pack
Slip Transaction Ty 2 - 2

Rate Info - identifies rate source and level

Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
64627	10/29/2020	EXP	WIP LWDA	Olympia Court fees Castro, Marcos v. Graphic Pa	1	75.00	75.00
64847	10/31/2020	EXP	WIP Postage	Olympia Postage Castro, Marcos v. Graphic Pa	1	13.80	13.80
65131	12/3/2020	EXP	WIP OneLegal - Complaint	Olympia Court fees Castro, Marcos v. Graphic Pa	1	1494.56	1494.56
65624	12/16/2020	EXP	WIP Attorney Service - Complaint Service	Olympia Atty Service Castro, Marcos v. Graphic Pa	1	67.99	67.99
65626	12/16/2020	EXP	WIP Attorney Service - Complaint Service	Olympia Atty Service Castro, Marcos v. Graphic Pa	1	286.50	286.50
65468	12/22/2020	EXP	WIP OneLegal - POS of Summons	Olympia Court fees Castro, Marcos v. Graphic Pa	1	12.20	12.20
65472	12/22/2020	EXP	WIP OneLegal - POS of Summons	Olympia Court fees Castro, Marcos v. Graphic Pa	1	12.20	12.20
66210	1/31/2021	EXP	WIP Photocopies	Olympia Photocopies Castro, Marcos v. Graphic Pa	21	0.25	5.25

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
66211	1/31/2021	EXP	WIP Postage	Olympia Postage Castro, Marcos v. Graphic Pa	1	1.60	1.60
66172	2/18/2021	EXP	WIP OneLegal - POS of Summons	Olympia Court fees Castro, Marcos v. Graphic Pa	1	14.25	14.25
66168	2/18/2021	EXP	WIP OneLegal - Notice of Minute Order	Olympia Court fees Castro, Marcos v. Graphic Pa	1	15.25	15.25
66480	2/28/2021	EXP	WIP Photocopies	Olympia Photocopies Castro, Marcos v. Graphic Pa	7	0.25	1.75
66481	2/28/2021	EXP	WIP Postage	Olympia Postage Castro, Marcos v. Graphic Pa	1	0.51	0.51
67633	5/31/2021	EXP	WIP Photocopies	Olympia Photocopies Castro, Marcos v. Graphic Pa	8	0.25	2.00
67634	5/31/2021	EXP	WIP Postage	Olympia Postage Castro, Marcos v. Graphic Pa	1	0.71	0.71
68761	8/31/2021	EXP	WIP Photocopies	Olympia Photocopies Castro, Marcos v. Graphic Pa	1	0.25	0.25
68762	8/31/2021	EXP	WIP Postage	Olympia Postage Castro, Marcos v. Graphic Pa	1	6.96	6.96
Grand Total				Billable	0.00		2010.78

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9:52 AM

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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		
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	Total	0.00		2010.78