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14 Attorneys for Plaintiff Marcos Castro

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **FOR THE COUNTY OF BUTTE**

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

20 Plaintiff,

21 v.

22 GRAPHIC PACKAGING
23 INTERNATIONAL, LLC, a Delaware
24 limited liability company, and DOES 1
25 through 10, inclusive,

26 Defendants.

CASE NO: 20CV01921

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

CLASS ACTION

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF RENEWED UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

DATE: June 8, 2022

TIME: 9:00 a.m.

DEPT.: 6

Action Filed: September 29, 2020

1 I, LARRY W. LEE, hereby declare and state as follows:

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

6 2. On October 29, 2020, Plaintiff Castro sent a letter to the L WDA, alleging
7 Defendant Graphic Packaging International, LLC ("Defendant") violated the California Labor
8 Code and seeking penalties under PAGA. On August 9, 2021, Plaintiff Castro submitted a
9 supplemental letter to the LWDA alleging additional violations under the California Labor Code.
10 Specifically, Plaintiff Castro alleged Defendant failed to pay minimum and overtime wages to
11 Defendant's non-exempt California employees and failed to provide accurate itemized wage
12 statements.

13 3. On December 2, 2020, Plaintiff Castro initiated his Action in the Orange County
14 Superior Court by filing a Class and Representative Action Complaint, on behalf of himself and
15 all other aggrieved employees (the "Castro Action"). The Castro Action was subsequently
16 removed to the United States District Court, Central District of California. On April 18, 2022, the
17 Castro Action was dismissed without prejudice in the District Court.

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

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

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

1 of Ogletree Deakins Nash Smoak & Stewart, P.C., a national employment defense law firm that
2 represents a significant number of Fortune 500 companies.

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

9 8. I have been approved as Class Counsel in a number of class actions, including but
10 not limited to *Chan-Lanier v. Citibank* (Case No. CGC-050445143); *Hernandez v. CVS*
11 *Pharmacy, Inc.* (Judicial Council Coordination Proceeding No. 4539), *Tse v. Best Buy Co, Inc.*
12 (Case Number BC 393717), *Ortega v. AIG, Inc.* (Case Number CV 06-196-RSWL (PJWx)), and
13 *Castro v. UPS Freight, Inc.* (Case Number CV 08-4898 ODW (CWx)) and *Chavez v. PVH* (Case
14 No. C 13-01797 LHK).

15 9. In addition, I was certified as class counsel by the United States District Court,
16 Central District of California in the cases *Abdullah v. U.S. Security* (Case Number CV 09-09554
17 GHK), *Avilez v. Pinkerton Government Services, Inc.* (Case Number SACV 11-0493-DOC),
18 *Dynabursky v. Allied Barton Security Services* (Case Number SACV 12-02210 JST); and *Pace v.*
19 *Petsmart, Inc.* (Case Number SACV 13-500-DOC); by the Northern District of California in the
20 cases of *Harris v. Vector Marketing Corp.* (Case Number CV 08 5198 EMC), and *Lemus et al. v.*
21 *H&R Block Enterprises, LLC* (Case Number CV-09-03179-SI); and by the Superior Court of
22 California, Orange County in the cases of *De la Cruz v. Abercrombie & Fitch Co. et al.* (Case
23 Number 30-2007-00036240) and *Wu v. General Nutrition Corporation* (Case Number 30-2012-
24 00593759), all as part of the Courts' orders granting class certification pursuant to Rule 23 of the
25 FRCP and California Code of Civil Procedure § 382. I served as lead counsel on these cases.

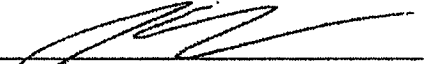
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1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3 Executed on this 3rd day of May 2022, at Los Angeles, California.

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5 Larry W. Lee
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