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Attorneys for Plaintiff,
EDWARD GNAT, on behalf of himself and all similarly aggrieved employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF MONTEREY

EDWARD GNAT, on behalf of himself and
all similarly aggrieved employees,

Plaintiff,

v.

QUINN COMPANY; and DOES 1 through
50, inclusive,

Defendants.

Case No. 20CV003431

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

Date: July 12, 2024
Time: 8:30 a.m.
Dept.: 15

Action Filed: December 21, 2020
Trial Date: Not Set

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 Named Plaintiff Edward Gnat (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. The proposed settlement meets the criteria for this Court to grant final approval of this matter on a class-wide basis as the settlement is fair, adequate, and reasonable. The settlement was achieved after Plaintiff engaged in significant discovery and litigation, and after mediation with the Honorable Steven Denton (Ret.).

3. Based on Class Counsel's independent investigations and evaluations, I am of the opinion that settlement is fair, reasonable, and adequate and is in the best interests of the Settlement Class and Defendant in light of all known facts and circumstances and the expenses and risks inherent in litigation. This settlement should be granted final approval.

4. I have been approved as class counsel in numerous other wage/hour class actions that have been granted class certification and final approval.

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

6. My firm's primary focus is employment law. I have handled a number of wage and hour matters including class actions and multiple-plaintiff actions. I have a practice that encompasses cases throughout the State of California, including but not limited to the Los

1 Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County
2 Superior Courts, the San Diego County Superior Courts, and the United States District Courts
3 for the Central, Eastern, Northern, and Southern Districts of California.

4 7. I have been named as class counsel in a number of class actions that have been
5 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
6 Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino
7 County, Santa Clara County, Sonoma County, and the United States District Court for the
8 Central, Eastern, and Northern Districts of California, including but not limited to the
9 following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior Court
10 Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior
11 Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-
12 0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court,
13 Judicial Council Coordination Proceeding No. 4480; *Tse v. Best Buy*, Los Angeles Superior
14 Court Case No. BC392717; *Hernandez v. CVS Corp. et al.*, Judicial Council Coordination
15 Proceeding No. 4539; *Padilla v. Safeway*, San Benito County Superior Court Case No. CU-16-
16 00182; *Valles v. Community Hospital of the Monterey Peninsula*, Monterey County Superior
17 Court Case No. 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior Court
18 Judicial Council Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*,
19 Alameda County Superior Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*,
20 Yolo County Superior Court Case No. CV-18-558.

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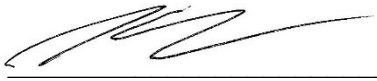
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8. To date, my firm has incurred costs in the amount of \$11,744.51. Attached as **Exhibit A** is a true and correct copy of the cost bill for this case, which details costs that were all necessary to the prosecution of this matter, including, for example, filing fees, service of process costs, mediation costs, and other costs.

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

Executed on this 18th day of June 2024, at Los Angeles, California.



Larry W. Lee

EXHIBIT A

6/12/2024
9:14 AM

DIVERSITY LAW GROUP
Slip Listing

Page 1

Selection Criteria

Slip Classification Open
Client (hand select) Include: Gnat, Edward v. Quinn
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		
74026	EXP	Valeria Tril	1	3.60	3.60
1/9/2023		Court fees			
WIP		Gnat, Edward v. Quinn			
Odyssey - Notice of Remote Appearance					
74684	EXP	Max Gavron	1	13.40	13.40
3/14/2023		Online researc			
WIP		Gnat, Edward v. Quinn			
Online Docs					
74708	EXP	Erika Mejia	1	126.90	126.90
3/17/2023		Court fees			
WIP		Gnat, Edward v. Quinn			
Odyssey - MTC					
74709	EXP	Erika Mejia	1	3.60	3.60
3/17/2023		Court fees			
WIP		Gnat, Edward v. Quinn			
Odyssey - Decl of MG iso MTC					
74725	EXP	Erika Mejia	1	65.25	65.25
3/23/2023		Court fees			
WIP		Gnat, Edward v. Quinn			
Odyssey - MTCs					
74835	EXP	Erika Mejia	1	3.60	3.60
4/7/2023		Court fees			
WIP		Gnat, Edward v. Quinn			
Odyssey - Reply iso MTC RFP					
74836	EXP	Erika Mejia	1	3.60	3.60
4/7/2023		Court fees			
WIP		Gnat, Edward v. Quinn			
Odyssey - CMS					
75040	EXP	Erika Mejia	1	3.60	3.60
5/5/2023		Court fees			
WIP		Gnat, Edward v. Quinn			
Odyssey - Joint CMS					

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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		
75046	EXP	Erika Mejia	1	3.60	3.60
5/5/2023		Court fees			
WIP		Gnat, Edward v. Quinn			
Odyssey - Reply iso MTC					
75047	EXP	Erika Mejia	1	3.60	3.60
5/5/2023		Court fees			
WIP		Gnat, Edward v. Quinn			
Odyssey - Supp RJN iso MTC					
75107	EXP	Valeria Tril	1	3.60	3.60
5/10/2023		Court fees			
WIP		Gnat, Edward v. Quinn			
Odyssey - Notice of Remote Appearance					
75334	EXP	Erika Mejia	1	3.60	3.60
6/1/2023		Court fees			
WIP		Gnat, Edward v. Quinn			
Odyssey - Notice of Withdrawal of MTC SROGs					
76048	EXP	Erika Mejia	1	3.60	3.60
9/5/2023		Court fees			
WIP		Gnat, Edward v. Quinn			
Odyssey - Joint CMS					
76213	EXP	Olympia	1	10898.40	10898.40
9/20/2023		Experts			
WIP		Gnat, Edward v. Quinn			
Econ One					
76239	EXP	Max Gavron	1	60.26	60.26
9/28/2023		Other travel			
WIP		Gnat, Edward v. Quinn			
Mediation Mileage					
76550	EXP	Erika Mejia	1	3.60	3.60
11/8/2023		Court fees			
WIP		Gnat, Edward v. Quinn			
Odyssey - Joint CMS					
77358	EXP	Erika Mejia	1	65.25	65.25
1/30/2024		Court fees			
WIP		Gnat, Edward v. Quinn			
Odyssey - MPA					
77410	EXP	Erika Mejia	1	3.60	3.60
2/5/2024		Court fees			
WIP		Gnat, Edward v. Quinn			
Odyssey - Amended MG Decl iso MPA					

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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		
77687	EXP	Erika Mejia	1	218.25	218.25
2/5/2024		Atty Service			
WIP		Gnat, Edward v. Quinn			
Attorney Service - Amended Decl					
77625	EXP	Erika Mejia	1	3.60	3.60
2/28/2024		Court fees			
WIP		Gnat, Edward v. Quinn			
Odyssey - NOE					
78494	EXP	Max Gavron	1	250.00	250.00
6/12/2024		Court fees			
WIP		Gnat, Edward v. Quinn			
MFA Filing Fees					
Grand Total					
			0.00		11744.51
			0.00		0.00
			0.00		11744.51