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Attorneys for Plaintiff, the Class, and Aggrieved Employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

JOSE CABALO, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

JONES LANG LASALLE AMERICAS,
INC., a Maryland corporation; and DOES
1 through 50, inclusive,

Defendants.

Case No.: 37-2020-00044322-CU-OE-CTL

(Assigned to the Hon. Ronald F. Frazier, Dept. C-65)

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

Date: March 17, 2023

Time: 8:30 a.m.

Dept.: C-65

Complaint Filed: December 3, 2020

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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, P.C., one of the attorneys of record for Plaintiff Jose Cabalo (“Plaintiff”). I have personal knowledge of the facts set forth below and I declare under penalty of perjury that I am qualified to testify I could and would do so competently.

3. 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.

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1 including the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco
2 Superior Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County
3 Superior Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV
4 06-0196-RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court
5 Case No. JCCP 4480; *Tse v. Best Buy*, Los Angeles Superior Court Case No. BC392717; and
6 *Hernandez v. CVS Corporation*, Los Angeles Superior Court Case No. JCCP 4539.

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

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

11 Executed on this 23rd day of February 2023, at Los Angeles, California.

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13 _____
14 Larry W. Lee