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Attorneys for Plaintiff
ANGELICA MACIAS, on behalf of herself and all similarly aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MONTEREY**

CECILIA ZAMUDIO, on behalf of herself
and all similarly aggrieved employees,

Plaintiff,

v.

CYPRESS HEALTHCARE PARTNERS,
LLC; and DOES 1 through 50, inclusive,

Defendants.

Case No. 20CV003329
[Related Case No. 21CV000056]

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

Date: March 10, 2023

Time: 8:30 a.m.

Dept.: 15

ANGELICA MACIAS, on behalf of herself
and all similarly aggrieved employees,

Plaintiff,

v.

CYPRESS HEALTHCARE PARTNERS,
LLC; and DOES 1 through 50, inclusive,

Defendants.

Complaint Filed: December 11, 2020
FAC Filed: February 23, 2021
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 Plaintiff Angelica Macias ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. Based on their own independent investigation and evaluation, the Parties and their respective counsel are of the opinion that settlement for the consideration and on the terms set forth in the Joint Stipulation of Class Action Settlement ("Settlement Agreement") is fair, reasonable, and adequate and is in the best interests of the Class and Defendant in light of all known facts and circumstances and the expenses and risks inherent in litigation.

3. I have spent significant time researching and pursuing the claims that have been alleged in this action. From the inception of the case, Class Counsel have zealously represented the interests of the Class. Class Counsel have engaged in significant meet and confer discussions with opposing counsel to obtain informal data and documents and to discuss the merits of the claims on behalf of the Class. This settlement was obtained for the benefit of the Class, as opposed to the individual Class Representatives. Based on my review of all the documents and information, and based on my experience in class action litigation, I believe this settlement to be fair, adequate, and reasonable.

4. I am one of the primary attorneys on this matter. My qualifications are as follows: I received my J.D. 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. Upon graduation, 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 that represents a significant number of Fortune 500 companies.

5. My firm's primary focus is employment law. I have handled a number of wage and

1 hour matters including class actions and multiple-plaintiff actions. I have a practice that
2 encompasses cases in the Los Angeles Superior Court, the Orange County Superior Court, Santa
3 Clara Superior Court, Monterey Superior Court, Sonoma Superior Court, San Francisco County
4 Superior Court, the San Diego County Superior Court, and the United States District Courts for the
5 Central, Eastern, Southern, and Northern Districts of California.

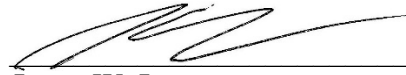
6 6. I have been approved as class counsel in a number of class actions, including but not
7 limited to *Chan-Lanier v. Citibank* (Case No. CGC-050445143); *Hernandez v. CVS Pharmacy, Inc.*
8 (Judicial Council Coordination Proceeding No. 4539), *Tse v. Best Buy Co, Inc.* (Case Number
9 BC393717), *Ortega v. AIG, Inc.* (Case Number CV 06-196-RSWL (PJWx)), and *Castro v. UPS*
10 *Freight, Inc.* (Case Number CV 08-4898 ODW (CWx)), and *Chavez v. PVH* (Case No. C 13-01797
11 LHK).

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

23 8. My co-counsel and I will adequately represent the Class Members in this action.
24 Class Counsel have and will zealously represent Plaintiffs and the Class and pursue this lawsuit to
25 its conclusion. I have no conflicts with the Class and will adequately represent the Class.

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

1 Executed on this 15th day of February 2023, at Los Angeles, California.

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