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Attorneys for Plaintiff, the Class, and Aggrieved Employees

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

JEANETTE OSMAN-BRAVARD, as an
individual and on behalf of all others similarly
situated,

Plaintiff,

vs.

PLACER TITLE COMPANY, a California
corporation; and DOES 1 through 50, inclusive,
Defendants.

Case No. CU21-085315

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

Date: October 21, 2022
Time: 10:00 a.m.
Dept.: 6

Complaint Filed: March 19, 2021
FAC Filed: March 26, 2021

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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
 nia, and am with the law firm Diversity Law Group, counsel of record for Named Plaintiff
 e Osman-Bravard (“Plaintiff”). I have personal knowledge of the facts set forth below and if
 o testify I could and would do so competently.

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

3. From the inception of the case, Class Counsel has zealously represented the interests of the Class. Class Counsel engaged in significant discussions with opposing counsel to obtain informal resolution of the case on behalf of the Class. This Settlement was obtained for the benefit of the Class, as opposed to the interests of any individual Class Representative.

4. I have spent significant time researching and pursuing the claims that have been alleged in this lawsuit. The Parties engaged in formal and informal discovery and participated in the exchange of information and Defendant's pertinent policies and practices. 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 adequate, and reasonable.

5. I do not have any relationship with or connection to Loaves and Fishes, the proposed cy beneficiary.

6. I am one of the primary attorneys on this matter. My qualifications are as follows: I earned my J.D. from Arizona State University College of Law in 2003. During law school, I was a law clerk and an 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 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

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

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

8 8. I have been named as Class Counsel in a number of class actions that have been granted
9 final approval by the Superior Courts of Los Angeles County, Orange County, San Francisco County,
10 and the United States District Court for the Central District of California, including the following Class
11 Actions: *Chan Lanier v. Citigroup, Inc., et al.*, San Francisco Superior Court Case No. CGC-05-
12 445143; *Naqvi v. Acoustic Home Loans, et al.*, Orange County Superior Court Case No. 05CC00263;
13 *Ortega v. AIG*, Central District of California Case No. CV 06-0196-RSWL (PJWx); *Universal*
14 *Protection Overtime Cases*, Orange County Superior Court, Judicial Council Coordination Proceeding
15 No. 4480; and *Hernandez v. CVS Corp., et al.*, Judicial Council Coordination Proceeding No. 4539.

16 9. My co-counsel and I will adequately represent the Class Members in this action.
17 Plaintiff's Counsel have and will zealously represent Plaintiff and the Class and pursue this lawsuit to its
18 conclusion. I have no conflicts with the Class and will adequately represent the Class.

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

21 Executed on this 29th day of September 2022, at Los Angeles, California.

22
23 
24 Larry W. Lee