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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 FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: May 19, 2023

Time: 10:00 a.m.

Dept.: 6

Complaint Filed: March 19, 2021

FAC Filed: March 26, 2021

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 Jeanette Osman-Bravard ("Plaintiff"). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I have spent significant time researching and pursuing the claims that have been alleged in this action. Based on my independent investigations and evaluations, I am of the opinion that the proposed settlement is fair, reasonable, and adequate, and is in the best interests of the Class Members, in light of all known facts and circumstances, and the expenses and risks inherent in litigation. The settlement was negotiated at arm's length and was facilitated by an experienced and neutral mediator. Thus, this settlement should be granted final approval.

3. 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.

4. My firm's primary focus is employment law. My primary practice is employment law. I have handled a number of wage and hour matters including class actions and individual actions, on both plaintiff and defense sides. I have a practice that encompasses cases throughout the State of California, including but not limited to the Los Angeles Superior Courts, the Orange County Superior Courts, the San Francisco County Superior Courts, the San Diego County Superior Courts, and the United States District Courts for the Central, Eastern, Northern, and Southern Districts of California.

5. I have been named as Class Counsel in a number of class actions that have been granted final approval by the Superior Courts of Los Angeles County, Orange County, San Francisco County,

1 and the United States District Court for the Central District of California, including the following Class
2 Actions: *Chan Lanier v. Citigroup, Inc., et al.*, San Francisco Superior Court Case No. CGC-05-
3 445143; *Naqvi v. Acoustic Home Loans, et al.*, Orange County Superior Court Case No. 05CC00263;
4 *Ortega v. AIG*, Central District of California Case No. CV 06-0196-RSWL (PJWx); *Universal*
5 *Protection Overtime Cases*, Orange County Superior Court, Judicial Council Coordination Proceeding
6 No. 4480; and *Hernandez v. CVS Corp., et al.*, Judicial Council Coordination Proceeding No. 4539.

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

9 7. To date, I have incurred approximately 67.2 hours in the prosecution of this matter, with
10 an hourly rate of \$800.00 per hour. I anticipate spending an additional 10.0 hours through final approval
11 and post-approval, including conferring with class members, defense counsel, and the administrator.
12 The total lodestar for my hours will be approximately \$61,760.00. Attached as **Exhibit A** is a summary
13 of my hours and tasks on this matter.

14 8. Since at least 2020, I have been approved at an hourly rate of \$750.00 per hour by
15 various Courts, including this Court. Examples of these Courts include the following cases: *Hernandez*
16 *v. Wells Fargo Bank*, Santa Clara County Superior Court Case No. 16CV299319, *Carrillo v. New*
17 *Balance Athletics, Inc.*, Santa Clara County Superior Court Case No. 19CV352469; *Ramirez v.*
18 *Walgreen Co.*, United States District Court, Northern District of California Case No. 18-cv-03921-EJD,
19 *Chavez v. Converse, Inc.*, United States District Court, Northern District of California Case No. 15-cv-
20 03746-NC; *Foster v. Schindler Elevator Corporation*, Alameda County Superior Court Case No.
21 RG19029640; *Foaad Hanna v. Equinix, LLC*, Santa Clara County Superior Court Case No.
22 18CV339365; *Alicia Harris v. 24 Seven LLC*, Los Angeles County Superior Court Case No. BC720144;
23 *Mary Della Maggiora v. Watsonville Community Hospital*, Santa Cruz County Superior Court Case No.
24 18CV00191; *Pittman v. Martinez Steel Corporation*, San Bernardino County Superior Court Case
25 No.CIVDS1823132; *Michael Randolph v. Pacific Racing Association*, Alameda County Superior Court
26 Case No. RG18908139; *Markham v. Quik Stop Markets, Inc.*, Santa Clara Superior Court Case
27 No.19CV341582; *Siron v. Raypak, Inc.*, Ventura Superior Court Case No. 56-2019-005279959-CU-OE-
28 VTA; *Carter v. Kline Services, Inc.*, San Bernardino Superior Court Case No. CIVDS1828867, and

1 *Prexxie Pascual and Arturo Fonseca v. Satellite Healthcare, Inc.*, Santa Clara Superior Court Case No.
2 19CV345211. I was approved at an hourly rate of \$800.00 per hour in *Jaime Moen v. Genentech, Inc.*,
3 San Diego County Superior Court Case No. 37-2021-00008619-CU-OE-CTL, and *Murray v. Granite*
4 *Wellness Centers et al.*, Nevada County Superior Court Case No. CU20-084680.

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

7 Executed on this 27th day of April 2023, at Los Angeles, California.

8 
9 _____
10 Larry W. Lee

EXHIBIT A

Osman-Bravard v Placer Title
Time and Task Chart for Larry W. Lee

Hours	Description of Work
4.8	Review client documents and employer background; prepare PAGA letter
1.6	Review and revise initial complaint
1.3	Review initial court orders; meet and confer with defense counsel re cmc; prepare cmc statement re same
.8	Review and revise first amended complaint
2.3	Confer with opposing counsel re mediation; request class data re same
6.2	Review written discovery served by Defendant; review and revise responses to same; review documents for production
7.9	Review and revise first set of written discovery to Defendant; review responses to same; meet and confer re same
7.4	Review and revise mediation brief; review class data; review and revise damages analysis for same
8.6	Attend mediation
3.8	Post-mediation discussions with all parties re settlement issues
5.5	Review and revise long form settlement agreement; confer with counsel re same
7.8	Review and revise Motion for Preliminary Approval and supporting documents thereto; prepare supplemental briefs re same; meet and confer re same
5.8	Confer with opposing counsel and class members re settlement issues
3.4	Review and revise motion for final approval
67.2	TOTAL HOURS