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Attorneys for Plaintiff and the Class

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

RAKESH RAY, as an individual and on
behalf of all others similarly situated,

Plaintiffs,

vs.

C&W FACILITY SERVICES, INC.,
Massachusetts corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: CIVSB2101321

[Assigned for all purposes to the Hon. David Cohn,
Department S-26]

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

Date: April 5, 2022

Time: 10:00 A.M.

Dept.: S-26

Complaint Filed: January 28, 2021

FAC Filed: April 22, 2021

SAC Filed: October 1, 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
 Ray (“Plaintiff”). I have personal knowledge of the facts set forth below and if called to
 I could and would do so competently.

2. Based on Class Counsel's 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 involved in litigation. The settlement was negotiated at arm's length and was facilitated by an independent and neutral mediator. Thus, this settlement should be granted final approval.

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, Rose & 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 the law firm of 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.

4. My primary practice is employment law. I have handled a number of wage and hour including class actions and individual actions, on both plaintiff and defense sides. I have a e that encompasses cases in the Los Angeles Superior Courts, the Orange County Superior the San Francisco County Superior Courts, the San Diego County Superior Courts, and the States District Courts for the Central, Northern, and Eastern Districts of California. I have umed as Class Counsel in a number of class actions that have been granted final approval by erior Courts of Los Angeles County, Orange County, San Francisco County, and the United District Court for the Central District of California, including the following Class Actions:

Manier v. Citigroup, Inc. et al., San Francisco Superior Court Case No. CGC-05-445143;

1 *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior Court Case No. 05CC00263; *Ortega*
2 *v. AIG*, Central District of California Case No. CV 06-0196-RSWL (PJWx); *Universal Protection*
3 *Overtime Cases*, Orange County Superior Court Case No. JCCP 4480; *Tse v. Best Buy*, Los Angeles
4 Superior Court Case No. BC392717; and *Hernandez v. CVS Corporation*, Los Angeles Superior
5 Court Case No. JCCP 4539.

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

8 6. To date, I have incurred approximately 6.8 hours in connection with the litigation of
9 this lawsuit. Attached hereto as **Exhibit A** is a chart summarizing the amount of work I have
10 incurred to date on this matter.

11 7. Thus, I anticipate the total amount of my fees incurred in this case to be
12 approximately \$5,100 based on an hourly rate of \$750.00 per hour. Since at least 2018, I have been
13 approved at an hourly rate of \$700.00 per hour by various Courts, in a number of matters, including
14 *Stafford v. Brinks et al.*, Los Angeles County Superior Court Case No. BC532260; *Chavez v.*
15 *Kenneth Cole Productions, Inc.*, Santa Clara Superior Court Case No. 17CV306407; *Chavez v.*
16 *Adidas*, U.S. District Court for the Northern District of California Case No. 5:16-cv-06533-LHK;
17 *Mankin v. Taste Catering*, San Mateo Superior Court Case No. 17-CIV-03497; *Ricardo Macias v.*
18 *SASCO*, Santa Clara County Superior Court Case No. 16CV304263; *Valles v. Community Hospital*
19 *of the Monterey Peninsula*, Monterey Superior Court Case No. 17CV003452; *Diaz v. WeDriveU*,
20 Santa Clara Superior Court Case No. 17CV306547; *Sanchez v. American Para Professional*
21 *Systems, Inc.*, Santa Clara County Superior Court Case No. 17CV306751; *Hernandez v. Pei Wei*,
22 United States District Court, Central District of California Case No. 8:17-cv-00679-JLS-JCG; *Song*
23 *v. THC-Orange County, Inc.*, U.S. District Court for the Central District of California Case No.
24 8:17-cv00965-JLS-DFMx; *Perez v. Standard Drywall, Inc.*, Alameda County Superior Court Case
25 No. RG15761142; *Huertas v. Chevron Stations*, Santa Clara Superior Court Case No.
26 17CV309996; and *In re DirecTv Wage and Hour Cases*, JCCP Case No. 4850. As of 2020, I
27 increased my hourly rate to \$750.00 per hour. I have been approved at \$750.00 per hour by the
28 Santa Clara County Superior Court in *Hernandez v. Wells Fargo Bank*, Santa Clara Superior Court

1 Case No. 16CV299319, and Monterey County Superior Court in *Abarca v. El Estero Car Wash,*
2 *Inc.*, Monterey Superior Court Case No. 18CV003398.

3 8. My firm has incurred costs in the amount of \$2,808.97. The costs are all litigation-
4 related costs, including court filing fees, CourtCall, postage, and research expenses. Attached hereto
5 as **Exhibit B** is a copy of costs my firm has incurred in connection with the prosecution of this
6 lawsuit.

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

9 Executed on this March 11, 2022, at Los Angeles, California.

10 

11 _____
Larry W. Lee

EXHIBIT A

Ray v. C&W Facility Services, Inc.
Larry W. Lee Time and Task Chart

Hours	Description of Work
.5	Review Complaint.
3.6	Edit settlement agreement and class notice.
2.0	Edit Motion for Preliminary Approval.
.7	Edit Motion for Final Approval.
6.8	TOTAL HOURS

EXHIBIT B

Selection Criteria

Slip Classification Open
Client (hand select) Include: Ray, Rakesh v. C&W
Slip.Transaction Ty 2 - 2

Rate Info - identifies rate source and level

Slip ID Dates and Time Posting Status Description		Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
65652 1/12/2021 WIP LWDA	EXP	Olympia Court fees Ray, Rakesh v. C&W	1	75.00	75.00
66006 1/28/2021 WIP Attorney Service - Complaint	EXP	Olympia Atty Service Ray, Rakesh v. C&W	1	1657.06	1657.06
66118 1/31/2021 WIP Postage	EXP	Olympia Postage Ray, Rakesh v. C&W	1	6.90	6.90
66451 2/23/2021 WIP Attorney Service - Complaint Service	EXP	Olympia Atty Service Ray, Rakesh v. C&W	1	70.00	70.00
66537 2/28/2021 WIP Postage	EXP	Olympia Postage Ray, Rakesh v. C&W	1	7.16	7.16
66774 3/10/2021 WIP Attorney Service - POS of Summons	EXP	Olympia Atty Service Ray, Rakesh v. C&W	1	64.70	64.70
67172 4/15/2021 WIP Attorney Service - Joint Report	EXP	Olympia Atty Service Ray, Rakesh v. C&W	1	64.70	64.70
66980 4/20/2021 WIP Courtcall	EXP	Nick Rosenthal Court fees Ray, Rakesh v. C&W	1	94.00	94.00

3/3/2022
12:56 PM

DIVERSITY LAW GROUP
Slip Listing

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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		
67188	EXP	Olympia	1	77.06	77.06
4/22/2021		Atty Service			
WIP		Ray, Rakesh v. C&W			
Attorney Service - FAC					
69177	EXP	Linda Lee	1	100.06	100.06
9/28/2021		Atty Service			
WIP		Ray, Rakesh v. C&W			
Attorney Service - Stip for Leave re SAC					
69587	EXP	Christine Choo	1	72.56	72.56
10/14/2021		Atty Service			
WIP		Ray, Rakesh v. C&W			
Attorney Service - Joint Report					
69454	EXP	Nick Rosenthal	1	94.00	94.00
10/20/2021		Court fees			
WIP		Ray, Rakesh v. C&W			
Courtcall					
69604	EXP	Olympia	1	77.06	77.06
10/20/2021		Atty Service			
WIP		Ray, Rakesh v. C&W			
Attorney Service - MPA					
69910	EXP	Linda Lee	1	8.50	8.50
11/5/2021		Online researc			
WIP		Ray, Rakesh v. C&W			
Online San Bernardino Superior					
70297	EXP	Christine Choo	1	246.21	246.21
12/6/2021		Atty Service			
WIP		Ray, Rakesh v. C&W			
Attorney Service - MPA					
70247	EXP	Nick Rosenthal	1	94.00	94.00
12/29/2021		Court fees			
WIP		Ray, Rakesh v. C&W			
Courtcall					
Grand Total					
			Billable	0.00	2808.97
			Unbillable	0.00	0.00
			Total	0.00	2808.97