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Attorneys for Plaintiff and the Class

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

IKEYEE JACKSON, as an individual and
on behalf of all others similarly situated,

Plaintiffs,

vs.

SAMUEL, SON & CO. (USA) INC., a
Delaware corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: CVRI2101679

(Assigned to the Honorable Harold Hopp, Dept.
10)

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

Date: June 5, 2023
Time: 8:30 a.m.
Dept.: 10

Complaint Filed: March 30, 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 Virginia, and am with the law firm Diversity Law Group, counsel of record for Plaintiff Ikeye (“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 Ogletree Deakins Nash Smoak & Stewart, P.C., Phleger & Harrison. I graduated *cum laude* from Arizona State University College of Law, ranked 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 a 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.

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

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 6. To date, I have incurred approximately 9.9 hours in connection with the litigation
10 of this lawsuit. Attached hereto as **Exhibit A** is a chart summarizing the amount of work I have
11 incurred to date on this matter.

12 7. Thus, I anticipate the total amount of my fees incurred in this case to be
13 approximately \$7,425.00 based on an hourly rate of \$750.00 per hour. Since at least 2018, I
14 have been approved at an hourly rate of \$700.00 per hour by various Courts, in a number of
15 matters, including *Stafford v. Brinks et al.*, Los Angeles County Superior Court Case No.
16 BC532260; *Chavez v. Kenneth Cole Productions, Inc.*, Santa Clara Superior Court Case No.
17 17CV306407; *Chavez v. Adidas*, U.S. District Court for the Northern District of California Case
18 No. 5:16-cv-06533-LHK; *Mankin v. Taste Catering*, San Mateo Superior Court Case No. 17-
19 CIV-03497; *Ricardo Macias v. SASCO*, Santa Clara County Superior Court Case No.
20 16CV304263; *Valles v. Community Hospital of the Monterey Peninsula*, Monterey Superior
21 Court Case No. 17CV003452; *Diaz v. WeDriveU*, Santa Clara Superior Court Case No.
22 17CV306547; *Sanchez v. American Para Professional Systems, Inc.*, Santa Clara County
23 Superior Court Case No. 17CV306751; *Hernandez v. Pei Wei*, United States District Court,
24 Central District of California Case No. 8:17-cv-00679-JLS-JCG; *Song v. THC-Orange County,*
25 *Inc.*, U.S. District Court for the Central District of California Case No. 8:17-cv00965-JLS-
26 DFMx; *Perez v. Standard Drywall, Inc.*, Alameda County Superior Court Case No.
27 RG15761142; *Huertas v. Chevron Stations*, Santa Clara Superior Court Case No. 17CV309996;
28 and *In re DirecTv Wage and Hour Cases*, JCCP Case No. 4850. As of 2020, I increased my

1 hourly rate to \$750.00 per hour. I have been approved at \$750.00 per hour by the Santa Clara
2 County Superior Court in *Hernandez v. Wells Fargo Bank*, Santa Clara Superior Court Case No.
3 16CV299319, and Monterey County Superior Court in *Abarca v. El Estero Car Wash, Inc.*,
4 Monterey Superior Court Case No. 18CV003398.

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

7 Executed on May 10, 2023, at Los Angeles, California.

8 
9 _____
Larry W. Lee

EXHIBIT A

JACKSON V. SAMUEL, SON & CO. (USA) INC.
Time and Task Chart for Larry W. Lee

Hours	Description of Work
1.5	Review and edit long form settlement agreement.
2.2	Review and edit Motion for Preliminary Approval and supporting documents.
3.8	Review and edit supplemental Motion for Preliminary Approval papers.
2.4	Review and edit Motion for Final Approval.
Total: 9.9	